

ASSESSING SCHOOL WELLNESS POLICIES IN THE GREATER KANSAS CITY
AREA: IDENTIFYING STRENGTHS AND CHALLENGES OF NUTRITION
POLICIES IN SCHOOLS

By

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Abstract

To better understand the current status of local school wellness policies in the greater KC area, schools from a seven county region were evaluated. The purpose of the overall study was to gather and evaluate current wellness policies in use at schools in the greater Kansas City Area, assess if the policies are meeting national standards and identify areas that need improvement. A random selection of 222 schools from 48 school districts was assessed using the WellSAT (Wellness School Assessment Tool). Discussion groups were held with key school personnel to identify the challenges, benefits, supports, and priorities needed for implementing the school wellness policies. A two-page survey was also administered online for school personnel.

All schools contacted reported that they used their district wellness policy and 46 of the 48 school districts policies were collected (95.8%). The two districts that did not provide their wellness policies were excluded from the study. The WellSAT results provided comprehensiveness and strength scores (100% highest possible score). The 46 policies averaged an overall score of 50.73% for total comprehensiveness and 22.88% for total strength. The “Standards for USDA Child Nutrition Programs and School Meal (US)” nutrition section was similar to the overall WellSAT findings, averaging a comprehensiveness score of 49.07% (vs. 50.73% overall) and an average total strength score of 22.98% (vs. 22.88% overall). The “Nutrition Standards for Competitive and Other Foods and Beverages (NS)” nutrition section scored lower in both comprehensiveness and strength when compared to the overall WellSAT, averaging a total comprehensiveness score of 41.71% (vs. 50.73% overall) and an average strength score of 6.66% (22.88% overall). These findings indicate that policies are written using

weak and vague language suggesting significant improvements can be made in the strength and comprehensiveness of written school wellness policies.

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Chapter 1: Introduction

Background

School wellness policies have been mandated by federal legislation in an attempt to reduce childhood obesity. The goal of the mandate was to set in place guidelines that will improve school-based nutrition and physical activity supports and practices. Current research shows that strong written policies foster improved healthy behaviors, lower risks for obesity, improved classroom behavior and academic performance. Many policies, however, contain weak language and are less specific in the guidelines that schools are required to follow. To better understand the current status of local school wellness policies, staff from Children's Mercy Hospitals and Clinics collaborated with researchers at the University of Kansas Medical Center (KUMC) to collect and assess established wellness policies.

Purpose

The purpose of the study was to gather and evaluate current wellness policies in use at schools in the greater Kansas City Area, assess if the policies are meeting national standards and identify areas of improvement. The study aimed to complete these goals:

1. Generate a representative sample of schools (elementary, middle, and high schools) in the greater Kansas City area (Kansas and Missouri).
2. Collect school wellness policies from each individual school and evaluate the policies using a standardized measure.
3. Compare the evaluations done in this study to the evaluations that have been previously completed (only available on Kansas policies; no data available in Missouri).

4. Collect the opinions of school personnel (i.e., school administrators, nurses, teachers, principals, school nutrition service personnel) on the needs and challenges of implementing and maintaining school wellness policy changes through focus group sessions and surveys.
5. Generate attention from the community to improve and enhance school wellness policies.

Research Statement

Specifically, this paper will focus on the nutrition aspect of the policies.

Throughout the research process the following questions were aimed to be answered:

1. Do written school policies assessed contain strong, specific language pertaining to the nutrition guidelines outlined by the standard for USDA Child Nutrition Programs and school meals (US) and the nutrition standards for competitive and other foods and beverages (NS) sections of the WellSAT (Wellness School Assessment Tool)? The hypothesis was that the policies will contain weak language and be lacking when compared to national nutrition guidelines and policy standards.
2. What barriers to meeting the nutrition guidelines presented in the previously mentioned sections of the WellSAT were identified by school personnel?

Chapter 2: Literature Review

Schools provide a unique opportunity to influence the health habits of school-aged children. In order for children to sustain healthy habits, it is important that schools and school districts work together to present consistent messages and regulations. In an effort to make that possible, schools and districts have created and implemented school wellness policies. These policies consist of three components: nutrition education, nutrition guidelines, and physical activity. Specifically, this literature review will focus on the nutrition guideline portion of the policies, but nutrition education and physical activity will be discussed briefly. National nutrition guidelines are in place, however many district policies are lacking when compared to these national standards. Through the utilization of PubMed, searches were conducted focusing on the background, design and implementation of school wellness policies. Assessment tools for evaluating these policies and studies focusing on these assessments were also examined. The search was limited to articles published over the past 5 years (2007- 2012).

Obesity Prevalence

Over the past few decades, obesity in school-aged children has been on the rise. According to the 2009-2010 National Health and Nutrition Examination Survey (NHANES), the prevalence of obesity ($\geq 95^{\text{th}}$ percentile Body mass index; BMI) has risen to 18% among children aged 6-11 and to 18.4% among adolescents aged 12-19 (1). Healthy People 2010 set overweight and obesity as a priority in the nutrition section of areas that Americans needed to make improvements. One of the goals was to reduce the proportion of children and adolescents who were overweight or obese from 11% (1988-1994) to 5% by 2010. However after the 2010 report, it appears the American youth body

mass indexes (BMI) are on the rise. The report found a 58.7% increase in the prevalence of obesity over the 10 year period (2). Healthy People 2020 aim is to decrease the proportion of children and adolescents who are obese. Specifically to decrease the overall weight status of children aged 2-19 by 10 percent (3).

School Meals

Most children eat meals at schools, resulting in a portion of their daily nutrition coming from the foods in the school cafeteria. If children consume both breakfast and lunch at school, it is estimated that they are obtaining an average of 47% of their total daily needed calories at school (4). The National School Lunch and Breakfast Program have policies set in place controlling the amount of calories, macronutrients, and micronutrients that are served in the cafeteria. The United States Department of Agriculture (USDA) requires that each breakfast served include one-fourth and each lunch served include one-third of the Dietary Reference Intakes (DRI'S) for calories, protein, vitamin A, vitamin C, iron and calcium. The guideline also restricts the amount of dietary fat; requiring that meals contain less than 30 percent of calories from fat and less than 10 percent of calories from saturated fat (5).

From data obtained through The Third School Nutrition Dietary Assessment Study (SNDA 3) in 2009, researchers found that schools were consistently serving foods higher than recommended in fat and sodium and lower in fiber (6). The foods that were the highest in fat, calories and sodium were found to be competitive foods. Competitive foods are described as foods and beverages sold outside the formal meal programs (i.e. a la carte, vending machine items) and are typically foods that lack nutritional value (5).

These foods and beverages are termed competitive because they interfere with the students' participation in the National School Lunch Program (NSLP).

The NSLP does not have guidelines that cover the sale of competitive foods. Competitive foods have been found to be extremely accessible to the students before, during, and after school hours (6). These competitive foods have contributed heavily to the overconsumption of calories and saturated fat leading to an increased BMI seen in school-aged kids (6). The 2006 School Health Practices and Policies Study found that secondary students had free access to foods of low nutritional quality. Additionally, only 30% of school districts were trying to restrict the food of minimal nutritional quality placed in the vending machines used by students during school (7). Unfortunately, the revenue generated from the advertising and sale of competitive foods has a significant impact on the increase of school budgets. This has led to a challenge in changing the mentality of a la carte and vending items sold in schools.

Government Mandates

Schools present a unique opportunity to make a difference in students' health by implementing district wide changes. This approach gives students a better chance to adapt and sustain healthier habits for the rest of their lives. In order for the changes to be implemented and adopted, policies and guidelines need to be adapted. *"Policies are more permanent than public health programs and are seen as having the greatest potential to eliminate obesity and healthy disparities"* ((8), p 1436).

The federal government has been under pressure to confront the rising obesity levels among school-aged children. In 2004, with the passing of the Child Nutrition and Woman Infant and Children (WIC) Reauthorization Act, Congress mandated that in order

for educational agencies to continue receiving funding from the National School Lunch Program (NSLP), they must create and implement a school wellness policy. The policies had to be finished prior to the beginning of the 2006-2007 school year. The Healthy, Hungry Free Kids Act (HHFKA) was passed in 2010, allocates specific funds for schools to use in revising their school wellness policies (9). Beginning in 2012, school nutrition programs started receiving funding to revise their existing policies and to assist in furthering policy implementation.

School Wellness Policy

The School Wellness Policy focuses on three aspects of student health: nutrition, physical activity and health education. Specifically the policies are required to include the following: (1) goals for nutrition education and physical activity to promote student wellness; (2) nutrition guidelines for all foods available on each school campus during the day; (3) an assurance that reimbursable school meals follow federal law; (4) a plan for measuring implementation of the policy; and (5) the involvement of parents, schools, the school food authority, school board, school administrators, and the public in the development of the policy (10). The policies are also required to address the certification of staff and educators that work with the students and credit hours that the students are mandated to participate in certain activities. Beyond requirements, school districts may include additional requirements tailored to their individual schools in their written school wellness policies.

Nutrition Section

The nutrition portion of the school wellness policy addresses the schools' nutrition guidelines requiring schools to describe how they will create and maintain an

environment that supports healthy eating habits. Schools are asked to document their requirements for NSLP meals and any regulations related to the sale of competitive foods. Further, schools must describe specific ways they will create a healthy nutrition environment. For example, schools must document how available whole foods (fresh fruits, vegetables, whole grains) are to the students and show they have adequate time and an appropriate setting for meals. The nutrition policies are also required to include ways in which they support the students to adopt a healthy lifestyle such as restricting access to competitive foods or prohibiting teachers use of food as a reward in the classroom. Of the three-wellness policy components, the nutrition portion has resulted in the most change since the mandate. Longley and Sneed reported, *“Following the legislations, 72.4% of the wellness components were in place. Nutrition components were the variables that changed the most and were reported as the components more frequently implemented”* ((11), p. 95).

Nutrition Education and Physical Activity Sections

The nutrition education and physical activity section of the policies were designed to address physical activity time, curriculum development and accessibility to the students. The overall aim of every section is to create a school environment that promotes and fosters lifelong healthy habits.

Statewide Policy Assessments

When the policies were developed, there was no funding awarded to implement the new changes set. Limited funds may have led to the policies being written to fulfill a requirement for the school, with little thought to their implementation or further development after they were written. In order for the improvements through the HHFKA

to be made in an effective manner, the assessment of policy effectiveness is critical.

Various states have conducted policy reviews to assess changes that have resulted from school wellness policies.

A Colorado-based study focused solely on the schools' nutrition habits before and after the wellness policy mandate (2005 and 2007). A validated questionnaire was given to food service managers and principals in 45 low-income, rural Colorado schools (12). The researchers reported promising results including an increase in fruit and vegetable options provided at lunch, the use of skinless poultry and an emphasis on providing healthy items during classroom parties. However, the policies proved to contain weak and vague language making them difficult to assess and left researchers doubting that these policies were being implemented. Another issue raised by the researchers was the lack of funding available to make the type of changes necessary to achieve the wellness policy guidelines (12).

Another study was done to assess the effect of the school wellness policy mandate on physical activity and nutrition policies (13). Public health surveillance data were collected from the School Health Profiles survey from the years 2002, 2004 and 2006. This study examined data from Washington and Oregon schools collected prior to the school wellness policy mandate compared to the first year following the implementation of the wellness policies. The researchers studied 30 specific questions concerning nutrition from a questionnaire administered for the School Health Profiles study. Prior to the mandate, only 9% of middle schools and 17.7% of high schools had favorable school food practices; giving students adequate time for lunch and also making fruits and vegetables readily available during school hours. After the mandate, researchers found

that nutrition policies were written in the policies according to the mandate. However, school food practices did not make a significant transition to the new policies (13).

Boles and colleagues also reported that schools that performed higher on academic tests were 14% more likely to restrict access to competitive foods (generally energy dense foods with little other nutritional value that “compete” with foods served as part of the school meals) than lower-performing schools on academic tests (13). The difference in access to competitive foods may imply that schools with better test scores, usually correlating to the availability of funds, can give their students more healthy options in contrast to students who attend schools that obtain lower test scores. Limited access to healthy food could indicate a need for funding at lower test-performing schools. However, funding received at these schools would most likely be used to improve the schools test scores to keep accreditations unless specifications for the funding were made. One of the challenges of school wellness is to convince influential leaders that incorporating school wellness can lead to higher academic achievement. There have been preliminary findings that suggest that an increase in physical activity and an improvement in students’ diets improves the students’ learning efficiency, indirectly lowers dropout rates, leads to better behavior and self-esteem and more engagement in school activities (14).

A Pennsylvania study assessed school wellness policy implementation by randomly selecting 499 schools involved in the National School Lunch program (15). The study designed a template based on state recommendations of what the policies should contain and compared the schools’ policies to the template. Most of the district local wellness policies met each mandate requirement, however the policy goals were

general, thus making them difficult to measure and leading researchers to believe that school staff would need further guidance on how to measure the effectiveness of the policy implementation (15).

These studies all encountered problems assessing policy effectiveness because of weak language and poor design of the policies themselves. The problems encountered suggest that assessing the policies themselves would be essential to understand the weak spots of the policy and how that impacts, or does not impact, the school. Once the weaknesses have been recognized then changes can be made. Hopefully, these changes would improve the overall results seen in the schools concerning healthy habits and eventually the health of the students themselves in relation to BMI and obesity.

Assessment Tool

Currently there is not a gold standard assessment tool for evaluating school wellness policies. Researchers funded by the Robert Wood Johnson Foundation have developed and validated a tool known as the WellSAT. This tool assesses the comprehensiveness and strength of a policy. The WellSAT is an abbreviated version (50 questions) of the 96-question tool, the Comprehensive Coding System to Measure the Quality of School Wellness Policies. The Comprehensive Coding System was tested in 2007-2008, when 60 policies were randomly selected and evaluated (16).

Researchers recognized the need for a quantitative method of policy evaluation because only descriptive methods had been previously used. Experts in nutrition, education, and physical activity worked together researching available suggested evaluation factors and combining them into the 96-question tool. Each question is rated a 0, 1 or 2 depending on the depth that the item is covered in the policy. When the policy

fails to mention an item a zero is warranted, a one is given if the topic is recommended or vague language is seen throughout the statement and a two is given when the item is described in a very descriptive and clear-cut manner. Nutrition guideline questions also may be ranked a three if the guideline meets the Institute of Medicine (IOM) recommendations or a four if the item is banned from the school altogether (16).

WellSAT Testing

Interrater reliability among evaluators was high ($p=0.82$) when comprehensive and strength scores were calculated showing that this tool has potential to measure policies accurately (16).

“The strength of this coding system is that it was developed by an interdisciplinary national working group and provides a quantitative method to code school wellness policies on seven key domains: nutrition education, standards for US Department of Agriculture child nutrition programs and school meals, nutrition standards for competitive and other foods and beverages, physical education, physical activity, communication and promotion, and evaluation” ((16), 1261).

Brenner and colleagues (17) used the WellSAT as an evaluation tool in their study. The researchers matched questions from the School Healthy Policies and Programs Study (SHPPS) with correlating questions on the WellSAT. The SHPPS was comprised of various school authorities asking questions concerning all aspects of the school community. They used the data from the answers of the SHPPS questionnaire to evaluate the wellness policies. Regarding nutrition, the study showed 1.8% of districts required

nutrition qualifications for school foodservice staff and 6.6% of districts are addressing increasing whole foods such as whole grains, unprocessed foods or fresh produce (17).

Recently Schwartz and colleagues (10) assessed policies in Connecticut school districts, using the WellSAT tool. The study focused specifically on the quality of written policies.

“The objective of establishing a written policy is to create a standard against which to hold the school community accountable for making changes that may take effort and commitment. If the policy is written with clear and strong language, it may have a better chance of being implemented as intended than would policies that are written in weak or vague language” ((10), 263).

The authors reported that their hypothesis was true, the better the policy scored on the WellSAT (strong language used) the more likely the policy was implemented in the schools. They found that the strength of the written policy was also positively correlated with the percentage of students eligible for free or reduced- price lunch ($r=0.21$, $p<.05$) (10).

Areas for Future Research

The potential for schools to impact a child’s health is promising. By beginning at the policy level, officials are attempting to establish a solid framework. Research is still needed related to the assessment and evaluation of these policies. First, a standardized, validated assessment tool that can be used for schools and districts to compare policies on a national level is needed. Using this tool, studies are needed to establish a baseline measure policies comprehensiveness and strength. They could then use the same tool to track changes in the policies over time. Multiple measures would allow researchers to

compare and contrast results and to see which areas of the policies are consistently lacking. Giving schools access to this tool would allow them to evaluate themselves and revise their policies easier. Then schools could also get an idea of how they rank in terms of strength and comprehensiveness when compared to other schools.

Evaluating whether the policies are being implemented in the schools is necessary. A policy does no good if it is not enforced at the ground level. Direct observation would be the gold standard for evaluating these measures. The findings would allow researchers to get a grasp of the impact the policies on the health of the students. Short-term and long-term health measures will need to be tracked. Height, weight, BMI and waist circumference are anthropometric measurements that can track the nutritional status of the students. In addition, qualitative tools such as surveys and questionnaires measure the students' knowledge and beliefs of nutrition habits.

Summary

Childhood obesity is a serious public health issue affecting nearly a third of all children nationwide (1). Schools can provide opportunities for children to engage in healthy eating and physical activity, given that children spend the majority of their day in this setting. In 2004, Congress mandated that any school participating in the National School Lunch program develop and implement a school wellness policy by the 2006-2007 school year. A school wellness policy consists of nutrition education, school meal and other food and beverage standards, and guidelines on physical education that promote student health. Strongly written policies lead to more successful implementation of healthy practices at the schools (10).

Chapter 3: Methods

Sample

A representative sample from elementary, middle, and high schools were selected randomly from Missouri and Kansas's districts near Kansas City according to the definition of public schools by each state: Missouri State Statutes- "all elementary and high schools operated at public expense, RSMo160-011"; Kansas Statute- "school operated by a unified school district organized under the laws of this state, KSA 72-89a01". Private schools were not included in this sample. A multi-stage probability sampling procedure, with a 95% confidence interval, resulted in 222 total schools being selected for this review. In Missouri, 5 counties were selected (i.e., Jackson, Lafayette, Cass, Clay, and Platte) representing 38 districts containing 87 elementary, 24 middle, and 25 high schools that were included in the study. Kansas had 2 counties selected (i.e., Johnson and Wyandotte) with 57 elementary, 18 middle, and 11 high schools representing 10 school districts.

School Contact

Each school was called individually in an attempt to obtain their wellness policy document via email or mail. A total of 3 call attempts were made to each school; if these attempts proved unsuccessful then a visit to each school was planned to try and obtain the policy from a school representative (i.e., school secretary, administrative official). If successful contact was not made, in order to preserve the sample size, one replacement school was randomly selected from the remaining schools in that district. Contact measures were then repeated with the newly selected school. All contact attempts were documented and recorded in a spreadsheet.

Policy Analysis

The school wellness policies were evaluated using a validated assessment tool; the WellSAT (Appendix A). The WellSAT is a shortened version of the 96-item Comprehensive Coding System to Measure the Quality of School Wellness Policies that was developed by the Robert Wood Johnson Foundation. The shortened version is comprised of five sections evaluating different components of the written school wellness policies: nutrition education and wellness promotion, standard for USDA child nutrition programs and school meals, nutrition standards for competitive and other foods and beverages, physical education and physical activity, and evaluation.

Two research staff members were trained to use the WellSAT and individually evaluated each school wellness policy with this tool. Responses were then compared, and if there was disagreement, three individuals of the research team reviewed the particular policy in question until consensus on the rating was achieved. The results were tested for 95% agreement and the magnitude of agreement was reported by the kappa statistic. The WellSAT is not intended for use in assessing the degree to which school districts have implemented their wellness policies.

WellSAT Scoring

School wellness policies were assigned a rating of 0, 1, or 2 for each item listed under each of the 5 content areas of the WellSAT. An item received a “0” if it was not mentioned in the wellness policy, a “1” if it was a weak statement using language such as “could”, “should”, “might”, or “encourage”, or a “2” if the item used strong language such as “shall”, “will”, “must”, or “require.” Questions covering nutrition standards also had ratings of “3” and “4” possible. A “3” was awarded if the guideline met Institute of

Medicine (IOM) standards and an item was graded with a “4” if a food item ban was specified in the policy. For example, if a school has a ban on allowing soft drinks on campus at all times then they would receive a 4 rating for that question. An item might also have received a rating of “N/A” or “Not Applicable” for items that addressed a specific school level requirement. For example, an item under Physical Education and Physical Activity states “Addresses time per week of physical education for high school students.” If a school district did not have a high school, they received a rating of “N/A.” The N/A rating did not penalize the school district’s total score.

The following is an example of how the WellSAT scoring works using question 1 of the “Standards for USDA Child Nutrition Programs and School Meals (US)

The wellness policy addresses access to and/or promotion of the School Breakfast Program (USDA).

In the school wellness policy being assessed, locate the place where the School Breakfast Program is discussed. Use the WellSAT instructions to determine which rating the wellness policy will receive for this specific question.

0. **Not mentioned.** Informing parents about the School Breakfast Program does NOT qualify for a "1" or "2."
1. Either of the following: Promotes a breakfast program without specifying the "School Breakfast Program" (USDA) or CFR Part 220. Encourages or suggests participation in the School Breakfast Program. **Examples:** "The district shall make every effort to offer school breakfast." "The district shall operate under USDA regulations for school food programs (e.g., School

Breakfast Program, National School Lunch Program, Special Milk Program, and Summer Food Service Program)."

2. **Meets or Exceeds Expectations**-Includes language to institutionalize the School Breakfast Program (e.g., specific reference to School Breakfast Program or CFR Part 220). **Example:** "All schools will provide breakfast through the USDA School Breakfast Program."

A rating was then given for the question when the reviewer determined which rating is most appropriate for wellness policy.

Comprehensiveness and Strength Scores

After ratings were given for each item listed under the 5 content areas, the WellSAT assessment provided two scores: a comprehensiveness score and a strength score. The comprehensiveness score was derived by calculating the total number of items that were given a rating of “1”, “2”, “3” or “4” divided by the total number of questions under each WellSAT content area. A comprehensiveness score reflects the extent to which the recommended content areas were covered in the school policy. Strength was calculated by the total number of items that received a “2”, “3”, or “4” and divided by the total number of questions under each WellSAT content area. A strength score describes how strongly the content is stated. Both the comprehensiveness and strength scores range from 0 to 100, with lower scores reflecting less content and weaker language. Higher scores indicate more content and use of specific and directive language.

Data Management and Analysis

A Microsoft Access database was created to aid in project management. The WellSAT scores were entered into a Microsoft Access database. Each research staff

member entered her own WellSAT assessment into the database. After entering the data was complete, queries were run to aid in the identifying of discrepancies between reviewers. If a discrepancy was found, research staff met to discuss and come to 100% agreement on the scoring. After this was complete, comprehensiveness and strength scores were calculated using the Access database. After all policies were entered and scores were found, content analysis was performed to look at gaps, strengths, and weaknesses seen throughout the policies.

Collection of School Personnel Opinions: Focus Groups

Seven focus groups were held to collect the opinions of school personnel that work within the selected school districts. School administrators, school nutrition services personnel, physical education instructors, and school nurses and teachers that oversee the implementation of the policies were the personnel targeted as focus group participants. At each of the group discussions, questions were asked about support needs, priorities and perceived barriers related to writing and implementing school wellness policies (Appendix B). Notes were taken and these sessions were recorded with permission of the school personnel in attendance. The focus groups recordings were later transcribed verbatim and then qualitative analysis was done with the content of the transcriptions to determine common themes across the focus groups.

Collection of School Personnel Opinions: Online Survey

Prior to leaving the focus group, the participants were also provided with a two-page survey (Appendix C) in order to gather their opinions on wellness policies in their specific schools. This survey was also provided online via Survey Monkey™ for school personnel who were not able to attend the focus groups, but would like to provide their

opinions. Survey respondents were asked to complete basic demographic information, including their school level, profession, school district, zip code, and state. Respondents also were asked to identify current practices and policies at their school regarding selected wellness policy issues. In addition, they were asked how beneficial those practices or policies were in supporting a healthy school environment. The survey results were analyzed using Microsoft Excel for content after all the surveys had been collected.

Study Approval

The University of Kansas Medical Center Human Subjects Committee (HSC) approved this study on December 28, 2011 (HSC # 12985).

Chapter 4: Results

Wellness Policies

Through contact with the 222 schools, it was found that each school followed a district wide policy. Out of the 48 district wide policies, 46 were obtained via email or mail. In Missouri 38 of the 38 district policies were obtained, while in Kansas 8 out of the 10 policies were obtained. The two absent districts in Kansas failed to respond to the contact attempts, resulting in exclusion from the assessment results.

Standards for USDA Child Nutrition Programs and School Meals (US) Scores

The comprehensive scores in the standards for USDA child nutrition programs and school meals (US) section of the WellSAT ranged from 0-100%. The strength scores for this section ranged from 0-71.43%. The mean district wellness scores for each question of this section can be found in Table 1. The highest scoring question in this section addresses the school meal environment, which averaged a rating of 1.11. Twenty-five of the policies received a rating of “2” concerning school meal environment. The school breakfast program was mentioned in 41 of the policies. All schools districts received a rating of “1” due to weak and vague language. The policy question regarding the availability of nutrition information of the school meals received the lowest average rating of 0.33. School breakfast programs was mentioned in about 89% of the policies but received a rating of “1” due to weak and unspecific statements. Thirty school policies failed to mention (rating of a “0”) anything about nutrition training for foodservice director, nutrition standards for schools beyond the USDA minimum standards or if they had nutrition information for school meals available.

Table 1. Itemized and mean scores for the Standards for USDA Child Nutrition Programs and School Meals (US) section of the WellSAT.

WellSAT Questions	Rating on WELLSAT items by number of school districts (0.0 = Not mentioned, 1.0 = Weak Statement, 2.0 = Meets/Exceeds Expectations)			Mean District US Rating (n=46)
	0	1	2	
Standards for USDA Child Nutrition Programs and School Meals (US)				
Addresses school meal environment.	20	1	25	1.11 ± 0.99
Addresses access to and/or promotion of the School Breakfast Program (USDA)	5	41	0	0.89 ± 0.32
Specifies strategies to increase participation in school meal programs	24	6	16	0.83 ± 0.93
Ensures adequate time to eat	22	18	6	0.65 ± 0.71
Ensures nutrition training for food service director and/or onsite manager (or other person responsible for menu planning).	30	3	13	0.63 ± 0.90
Addresses nutrition standards for school meals beyond USDA (National School Lunch Program/School Breakfast Program) minimum standards	31	2	13	0.61 ± 0.91
Nutrition information for school meals (e.g., calories, saturated fat, and sugar) is available.	32	13	1	0.33 ± 0.52

Nutrition Standards for Competitive and Other Foods and Beverages (NS) Scores

The comprehensive scores in the NS section of the WellSAT ranged from 0-87.5%. The strength scores for the NS section of the WellSAT ranged from 0-68.75%.

The mean district wellness scores for each question of this section can be found in Table

2. The WellSAT question concerning fat content of foods served outside (competitive foods) of USDA meals received the highest average score in the NS section 0.96.

Regulation of vending machines, a la carte foods, foods served at class parties, foods sold for fundraisers and school scores were all mentioned and received a rating of “1” in at least 35 of the district policies. The question addressing whole grain promotion had an

average rating of 0.39 with 18 of the districts receiving a rating of “1”. Food used as a reward in the classroom had an average WellSAT rating of 0.35. The lowest average score received in this section was 0.04 given to the WellSAT question concerning access to drinking water. This was the only section where a policy could receive a rating of “4” for a question. However, none of the policies mentioned any type of ban for any food item so a score of “4” was not given to any school district policy.

Table 2. Itemized and mean scores of Nutrition Standards for Competitive and Other Foods and Beverages (NS) section of the WellSAT.

WellSAT Questions	Rating on WELLSAT items by number of school districts (0.0 = Not mentioned, 1.0 = Weak Statement, 2.0 = Meets/Exceeds Expectations, 3.0 = Meets IOM Standard, 4.0 = School Instituted Ban)					Average District NS Rating (46 school districts)
	0	1	2	3	4	
Nutrition Standards for Competitive and Other Foods and Beverages (NS)						
Addresses limiting fat content of foods sold/served outside of USDA meals.	27	2	9	8	0	0.96 ±1.23
Regulates vending machines.	5	39	2	0	0	0.93 ±0.39
Regulates food service a la carte OR food sold as an alternative to the reimbursable school meal program (if not defined as to what this means).	7	37	2	0	0	0.89 ±0.43
Regulates food served at class parties and other school celebrations.	7	39	0	0	0	0.85 ±0.36
Regulates food sold for fundraising at all times (not only during the school day).	7	39	0	0	0	0.85 ±0.36
Regulates school stores.	9	35	2	0	0	0.85 ±0.47
Addressing limiting sugar content of foods sold/served outside of USDA meals.	31	7	7	1	0	0.52 ±0.84

WellSAT Questions	Rating on WELLSAT items by number of school districts (0.0 = Not mentioned, 1.0 = Weak Statement, 2.0 = Meets/Exceeds Expectations, 3.0 = Meets IOM Standard, 4.0 = School Instituted Ban)					Average District NS Rating (46 school districts)
	0	1	2	3	4	
Nutrition Standards for Competitive and Other Foods and Beverages (NS)						
Addresses increasing “whole foods” (whole grains, unprocessed foods, or fresh produce) sold/served outside of USDA meals.	28	18	0	0	0	0.39 ±0.49
Addresses limiting sugar content of beverages sold/served outside of USDA meals.	33	9	4	0	0	0.37 ±0.65
Addresses food not being used as a reward.	31	14	1	0	0	0.35 ±0.53
Addresses limiting fat content of milk sold/served outside of school meals.	39	2	1	4	0	0.35 ±0.90
Addresses limiting regular (sugar-sweetened) soda sold/served outside of USDA meals.	33	12	0	1	0	0.33 ±0.60
Addresses limiting calorie content per serving size of foods sold/served outside of USDA meals.	39	3	2	2	0	0.28 ±0.75
Addresses serving size limits for beverages sold/served outside of school meals.	43	2	1	0	0	0.09 ±0.35
Addresses limiting sodium content of foods sold/served outside of USDA meals.	45	0	0	1	0	0.07 ±0.44
Addresses access to free drinking water.	45	0	1	0	0	0.04 ±0.30

Comprehensiveness and Strength Scores

Table 3 provides the mean comprehensive and strength scores for the overall WellsAT, the standard for USDA child nutrition programs and school meals (US) section of the WellsAT, and the nutrition standards for competitive and other foods and

beverages (NS) section of the WellSAT. The highest score available in any section is 100%. Total comprehensiveness received a better ranking than the total strength score in all three sections. The nutrition standards for competitive and other foods and beverages scored poorly in the total strength section, scoring about 7% out of 100%. This nutrition standard score indicates that this particular section of the wellness policies did not contain strong, directive language and lacking in specificity. The policies had better comprehensive scores in the two nutrition sections (US=49%, NS=41%) when compared to their strength scores (US= 23%, NS= 7%). This indicates that fifty percent of the questions in the nutrition portions of the WellSAT, were not found in the district policies.

Table 3. Average comprehensiveness and strength scores by WellSAT section.

WellSAT Section	Total Comprehensiveness (total # of items rated a “1” or “2” /# questions in section x 100)	Total Strength (total # of items rated a “2” or higher / # questions in section x 100)
Combined WellSAT (50 questions)	50.73%	22.88%
Standards for USDA Child Nutrition Programs and School Meals (US)	49.07%	22.98%
Nutrition Standards for Competitive and Other Foods and Beverages (NS)	41.71%	6.66%

Focus Groups

Seventy individuals participated in the seven focus groups, with an average of 10 at each group discussion. Focus groups lasted approximately 60 minutes. The participants identified several common nutrition benefits that resulted from the implementation of the school wellness policies. Several school personnel reported an increase in fresh fruits and vegetables offered during the school day and a greater focus on offering healthier snacks. As one participant succinctly stated, *“From an application standpoint, we partner with a couple of farmer’s markets. We’ve been bringing a lot of fresh fruit and produce in and we’ve seen a large increase in students choosing that choice, it’s very popular now.”*

Nutrition challenges and concerns were also discussed such as outside sources of food, which was brought up at every focus group. This comment captured the sentiments of many focus group participants. *“School meals follow standards; it’s the other things going on in schools that negate it.”* Participants discussed the extra calories students were consuming every day from rewards, birthday parties and parents bringing in high calorie and high fat food for lunch. Other nutritional concerns were related to revenue. Fundraising and vending machines contributed a high majority of unhealthy, calorically dense foods. School personnel discussed the desire to implement the new nutrition standards but once revenue started to go down the old methods were put back into place. As one participant shared, *“Junk food machines went out, revenue went down. So (they) put the junk food machines back in.”* Participants mentioned that the revenue from these sales help drive the athletic programs and other extracurricular activities. The focus group participants indicated that the challenge was to find ways to decrease the availability of

low nutritional quality items to the student while keeping revenue the same.

The participants recognized administration, community, supplemental school and monetary support as being the most helpful in implementing and improving their existing policies. Nutrition policies were identified as priorities for the schools to improve. These included nutrition education targeted to the parents and an emphasis on healthier foods. There was a big desire to change the policies concerning outside food sources, to either ban food at parties or as rewards or make them standardized across the district. One participant summed up this desire to standardize policies within the district, stating, *“For good example, party guidelines. If our district would sit down and say, these are our healthy eating party guidelines, every school would do this.”*

Online Surveys

The school wellness survey was available online from March 16th-May 18th 2012 with a total of 156 school personnel completing the online survey. The 70 focus group participants were invited to complete the survey and distribute the survey link to their peers. There were 12 survey respondents out of the 156 who were from private schools or outside of the study’s geographic boundaries. . The remaining 144 respondents represented one of the 32 districts in this study.

School personnel at elementary schools completed approximately 55% of the total number of surveys (Figure 1). A variety of school personnel completed the surveys, with 64% of responses from school nurses (Figure2).

Figure 1. Respondent Employment.

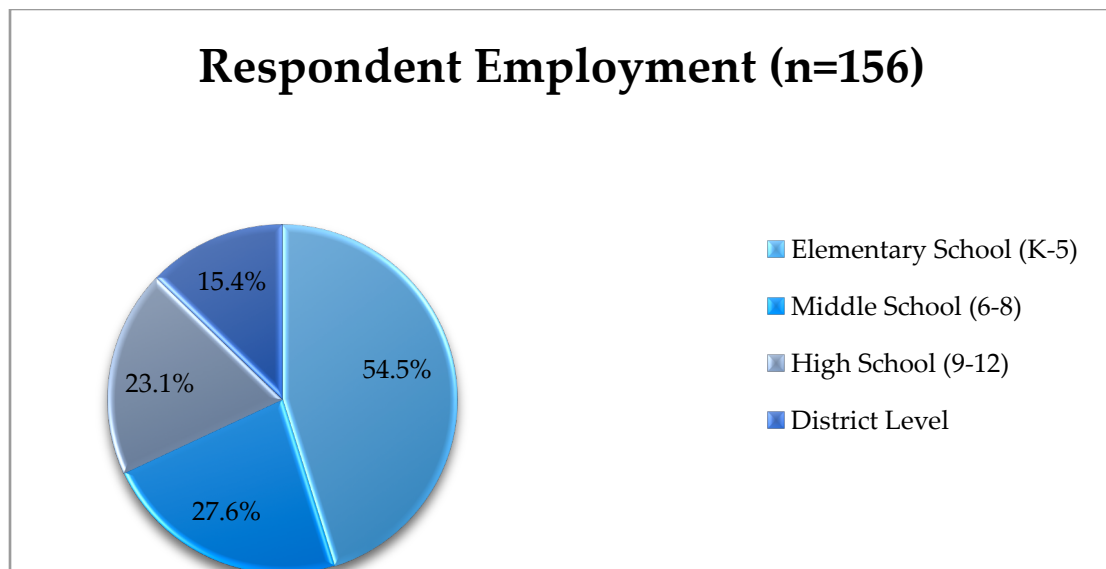
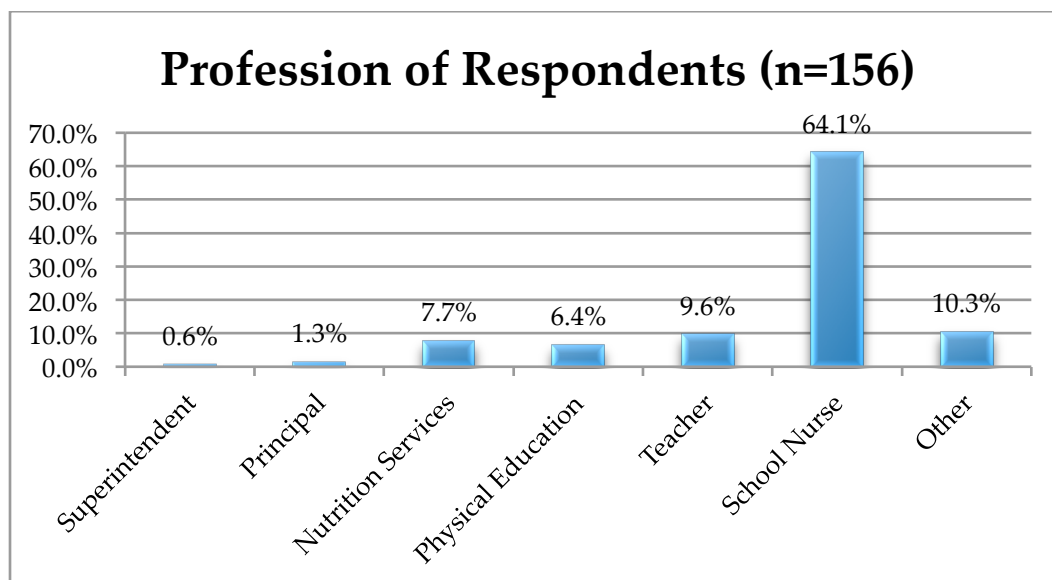


Figure 2. Profession of Respondents.



Survey respondents were asked to complete 38 questions regarding their opinions about current school wellness policies and practices in their schools. Table 4 addresses the first set of nutrition questions. Forty- eight percent of the respondents indicated students were allowed to have food or beverages in the classroom. Water was allowed in

the classroom at 87% of the respondents' schools. Parents were allowed to bring lunch to their children during the school day at 62% of the respondents' schools. Only 10% reported students being allowed to leave the school grounds during the lunch hour. School personnel were then asked to rate how beneficial the nutrition policies and practices are in supporting a healthy school environment. Seventy-six percent of the school personnel felt that water in the classroom supported a healthy school environment. Bringing outside food in for lunches and the allowance for students to leave school grounds for lunch made the healthy school environment worse, reported by about 75% of respondents.

Table 4. Respondent answers to survey questions concerning first nutrition section.

Current Practice – In our school (s) students are allowed to:		Rate how beneficial you believe these student practices are to support a healthy school environment	
	All Respondents		All Respondents
a. Have food or beverage in the classroom.			
(n=156)		(n=152)	
Yes	48.08%	Makes Better	12.51%
No	44.87%	May Benefit	40.13%
Don't Know	7.05%	No Impact	7.89%
		Makes Worse	39.47%
b. Have water in the classroom.			
(n=156)		(n=152)	
Yes	86.54%	Makes Better	75.66%
No	10.26%	May Benefit	21.05%
Don't Know	3.21%	No Impact	3.29%
		Makes Worse	0.00%
c. Bring food/ have parents bring food into the cafeteria from fast food restaurants at lunch.			
(n=156)		(n=151)	
Yes	62.18%	Makes Better	1.32%
No	32.69%	May Benefit	7.28%
Don't Know	5.13%	No Impact	17.22%
		Makes Worse	74.18%
d. Leave school grounds during lunch.			
(n=156)		(n=152)	
Yes	10.26%	Makes Better	2.63%
No	87.82%	May Benefit	1.97%
Don't Know	1.92%	No Impact	23.68%
		Makes Worse	71.72%

The next set of nutrition questions are addressed in Table 5. “Foods were used as a reward or incentive at school” was reported by 66% of participants. Thirty-three percent of respondents indicated schools allowed chocolate, candy and high-fat baked items in classroom fundraising, 56% of respondents reported the use of these products in school-wide fundraising and 52% of respondents indicated these products were used for fundraising by sports teams and or clubs. Sixty-four percent (64%) of respondents indicated their schools regulated nutrition standards for food and beverages sold in school vending machines. Respondents reported that food and beverages sold in schools or at school events had nutrition regulations set in place at 38% of the schools. Respondents also viewed the use of food as reward or incentives a hindrance to a healthy school environment, with 61% reporting this lack of policy made a healthy school environment worse. Sixty-five percent of the responses reported that using chocolate, candy and high-fat baked items in any type of fundraising setting was detrimental to achieving a healthy school environment. About sixty-five percent of respondents indicated that regulating nutrition standards of food and beverages sold in school vending machines and at school events would benefit a healthy school environment.

Respondents reported that classroom fundraising was used in 33% of the schools, school sports teams and/or clubs fundraising was allowed in 52% of schools and school-wide fundraising was reported by 56% of the respondents. Vending machines were reported by participants to be regulated 64% of the time. Sixty-four percent of the respondents answered that they believed regulating the nutrition standards of all food and beverages sold in the school would make a healthy school environment better.

Table 5. Respondent answers to survey questions concerning second nutrition section.

Current Practice- In our school (s) students are allowed to:		Rate how beneficial you believe these student practices are to support a healthy school environment.	
	All respondents		All respondents
a. Use foods as rewards or incentives for students.			
(n=155)		(n=151)	
Yes	66.45%	Makes Better	3.31%
No	21.94%	May Benefit	19.87%
Don't Know	11.61%	No Impact	15.89%
		Makes Worse	60.93%
b. Classroom fundraising.			
(n=152)		(n=148)	
Yes	32.89%	Makes Better	2.70%
No	44.74%	May Benefit	6.76%
Don't Know	22.37%	No Impact	23.65%
		Makes Worse	66.89%
c. School-wide fundraising.			
(n=153)		(n=149)	
Yes	56.21%	Makes Better	2.02%
No	28.76%	May Benefit	6.71%
Don't Know	15.03%	No Impact	24.83%
		Makes Worse	66.44%
d. Fundraising by school sports teams and/or clubs.			
(n=153)		(n=146)	
Yes	51.63%	Makes Better	2.05%
No	26.80%	May Benefit	5.48%
Don't Know	21.57%	No Impact	30.82%
		Makes Worse	61.65%
e. Regulate nutrition standards of food and beverages sold in school vending.			
(n=151)		(n=152)	
Yes	64.24%	Makes Better	69.08%
No	16.56%	May Benefit	26.97%
Don't Know	19.21%	No Impact	3.95%
		Makes Worse	0.00%
f. Regulate nutrition standards of food and beverages.			
(n=154)		(n=152)	
Yes	37.66%	Makes Better	64.47%
No	32.47%	May Benefit	29.61%
Don't Know	29.87%	No Impact	5.92%
		Makes Worse	0.00%

Adequate funding was also addressed in the survey. Fourteen percent (14%) of respondents indicated there was adequate funding available to implement changes

outlined in the school wellness policies. However, approximately one-third reported there was not adequate funding while more than 50% reported that they were not sure.

Table 6. Respondent answers to adequate funding question on survey.

a. Does your school have adequate funding to implement your school's wellness policy?				
	(n)	Yes (%)	No (%)	Not Sure (%)
All Respondents	151	14.57	31.79	53.64
Super Intendant	1	100.00	0.00	0.00
Principal	2	50.00	50.00	0.00
Nutrition Service	9	22.22	44.45	33.33
PE Teacher	10	10.00	50.00	40.00
Teacher	15	6.67	53.33	40.00
Nurse	99	15.15	26.26	58.59
Other	15	6.67	26.67	66.66

Chapter 5: Discussion

With the obesity rates in children on the rise, schools present a unique opportunity to positively impact the health of their students. The government recognized this opportunity, and mandated that each school create a wellness policy by the 2006-2007 school year with the passing of the Child Nutrition and Woman Infant and Children (WIC) Reauthorization Act (9). This study focused on evaluating the comprehensiveness and strength of written school wellness policies in place in the greater Kansas City area. During the evaluation process, the benefits, challenges, supports needed and priorities in conjunction with implementation of the nutrition portion of school wellness policies were also researched. The findings in this study are similar to other published studies on this topic.

Strength of Wellness Policies

The overall assessment of the 46 school district policies, using the WellSAT indicated policies contain weak language. Instead of specific language, the most common terms found in the policy statements were vague such as “might, try, or encourage”. Further, many of the policies also listed guidelines or used goal statements with regard to nutrition standards. Strong and specific language was lacking in the majority of policies. Weak language among the school districts policies is concerning because well-developed policies containing strong specific language is positively correlated with how well the policy is implemented at the school. In fact, of the 38 school districts in Missouri, 12 districts adopted the same wellness policy template, rather than developing policies aimed at their individual school. A study from Connecticut examining 15 school districts found written policies promoted the implementation of wellness practices and schools

having the most individualized and comprehensive policies achieved the most success (10). Focus group participants also recognized the struggle of policy implementation, describing how time was spent writing the policy but then it was put on the shelf and forgotten about. Similarly, studies done in Washington State and Oregon experienced the establishment of nutrition guidelines in written policies but little changes in actual practice (13). Evidence shows that policies that are comprehensive and explicit in manner have a better success of implementation and creates an environment that foster sustainable healthy habits (17).

School Nutrition Practices

Portions of children consume almost half of their daily nutrition needs at school (4). This fact strengthens the argument that high nutritional quality foods should be consistently offered at schools. Some studies have reported that after the implementation of wellness policies, the most change was seen in nutrition practices at the schools. Increases in the availability of fruit and vegetables at the school along with an increase of participation in the school lunch programs were both reported (11). Alternatively, other studies report no changes seen in the nutrition practices at the school. A Colorado study evaluated the school environment along side the wellness policies. Researchers found that in schools with weakly worded wellness policies there were no changes in the following: daily offerings of fruits and vegetables, schools obtaining fresh produce from local farmers, percent of schools selling high fat options in a la carte offerings and in the encouragement of fruit and vegetable consumption (12).

WellSAT results from the “Standards for USDA Child Nutrition Programs and School Meals (US)” section found that many of the policies mentioned broad school

practices (adequate time to eat, access Breakfast Program) but none of the areas received mean rating over “1.0” indicating that the policies were vague and lacked specificity. Creating policies that are more comprehensive gives the practices a better chance of being implemented at the school level. Weak nutrition statements and practices contribute to students consuming lower nutritional quality foods, which contribute to the obesity issue. Story reports that the availability of snacks and drinks sold at school are directly related to the high intake of calories, soft drinks, total fat and saturated fat along with a decrease of intake of fruits and vegetables seen in students (7). Creating a comprehensive and strong policy can set nutrition standards and result in schools cutting down on the high intake of soft drinks and snacks by students.

Competitive Food Sales

The National School Lunch Program (NSLP) currently does not have any regulations when it comes to the sale of competitive foods (5). Not surprisingly, competitive food options were found to be the highest in fat, calories and sodium in a school cafeteria setting (6). School wellness policies provide the avenue through which these foods could be regulated. The majority of the written policies lacked regulations when it came to the sale of foods outside of the regulated USDA meals. Over three-fourths of all districts did mention broad regulations for vending machines, a la carte sales, class parties and fundraising but failed to specify what the regulations were. However, focus group participants did report benefits seen from the implementation of their school wellness policy, including an increase of the availability of fruits and vegetables. This raises a good point; just because a healthy practice is not listed in the policy does not mean that it is not being utilized in the schools.

Revenue is a big concern, however, when the discussion of adjusting how a la carte and competitive food options in the cafeteria are regulated. This study had consistent results with previous studies with schools finding it difficult to regulate the sale of competitive foods because the loss of revenue is detrimental to their budget (7). Similarly, focus group participants also identified the struggle of regulating competitive food sales because of the loss of revenue.

Supports Needed

Supports are also needed from parents, school administration and community members to fully and successfully implement wellness policies into the school and school community. Participants in focus groups discussed the pushback received from parents concerning regulating foods sold for fundraisers, fast food being brought into the school during lunch or foods brought for class parties or celebrations. Funding was also identified as a barrier on the survey given to school personnel. Brener discusses similar barriers identified in their study:

“Barriers include inadequate funding, competing priorities; insufficient time in the school day; lack of support from students, parents and community members; and lack of adequate tools and training to support those responsible for policy development, implementation and evaluation (17).”

Strengths and Limitations

First, the WellSAT is a validated tool for testing school wellness policies in previous research studies. The tool is thorough and gives quantitative data in two measures: strength and comprehensiveness. The sample of this study was another strength. The sample was a large representative sample of the greater Kansas City area

and the study achieved a 96% response rate (46 of 48 district policies obtained). The response rate to the online survey (n=156) from school personnel was also a strength. This allowed researchers to gather opinions from a variety of people. The variety of sources that data were collected from- written policy assessment using the WellSAT, focus group discussions and the online survey- contributes to the strength of the studies. Researchers were able to study the written policy and compare that to what practices were occurring from the schools in the form of the school personnel feedback through the focus groups and online survey.

The limitations of this study include the following. First, implementation of the policies was not measured, only the written policies were assessed. Additionally, nurses made up the majority of the respondents who participated in answering the online survey. Classroom teachers and food service directors might have responded differently to some of the items specifically related to nutrition and classroom practices. Gaining the perspectives from these personnel would have greatly enhanced the online survey data collected. Another limitation was that this study was only limited to public schools. Due to this, results may not be generalizable to all school populations.

Conclusion

Overall, school wellness policies in the Kansas City area have room for improvement. Nutrition sections of school wellness policies are no different. Also, the low strength scores indicate that the nutrition information and guidelines that were found in the policies were vague and weak.

The results of this study indicate that work needs to be done to strengthen the written school wellness policies of the schools located in the greater Kansas City

metropolitan area. Additionally, efforts to assist with implementation at the individual school level may be justified. Representatives from the schools indicated that funding to fully implement the policies were lacking. Future studies are warranted to further research concerning policy implementation.

Chapter 6: Summary

The purpose of this thesis project was to evaluate the school wellness policies nutrition content in the greater Kansas City area and identify areas for improvement. The sample consisted of 222 schools in the greater Kansas City area comprising of 48 total school districts, 38 in Missouri and 10 in Kansas. KUMC staff collected 46 of the 48 district wellness policies and evaluated them using the WellSAT assessment tool. Focus groups and an online survey was also conducted to gather opinions from key school personnel members involved in the creation and implementation of school wellness policies.

All schools contacted reported that they used their district wellness policy and 46 of the 48 school districts policies were collected (95.8%). The two districts that did not provide their wellness policies were excluded from the study. The WellSAT results provided comprehensiveness and strength scores (100% highest possible score). The 46 policies averaged an overall score of 50.73% for total comprehensiveness and 22.88% for total strength. Nutrition sections in particular were found to have lower scores than the overall WellSAT averages. The “Standards for USDA Child Nutrition Programs and School Meal (US)” averaged a comprehensiveness score of 49.07% an average total strength score of 22.98%. The “Nutrition Standards for Competitive and Other Foods and Beverages (NS)” averaged a total comprehensiveness score of 41.71% and an average strength score of 6.66%. These findings suggest that significant improvements can be made in the strength and comprehensiveness of written school wellness policies.

Focus groups revealed that there was a need for assistance when implementing these policies. Surveys found that there are some promising practices being implemented

in schools including respondents reporting students are allowed to have water in classrooms and the belief that the use of high fat baked goods as a fundraising source does not support a healthy school environment. However, respondents did report that these high fat baked goods are currently being used as a fundraising source.

The findings from this study enable schools to identify areas where they are doing well and areas where collaborative efforts will be most helpful to improve their wellness practices. Future research is warranted in this area and could further identify improvements and areas of strength in schools. Future studies should include direct observations in school practices and aiding in implementation of the policies in the schools.

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APPENDIX A

School Wellness Policy Evaluation Tool

Developed by the Robert Wood Johnson Foundation
Healthy Eating Research Program, Working Group 1

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The School Wellness Policy Evaluation Tool provides a standard method for the quantitative assessment of school wellness policies. Such policies have been required since 2006 in all school districts participating in the National School Lunch Program. This tool offers a consistent and reliable means of assessing the comprehensiveness and strength of school wellness policies within or among states. It was developed by researchers funded by the Robert Wood Johnson Foundation.

How to Rate Policy Statements

School wellness policies are evaluated based on the degree to which they address 50 policy items, which are categorized into five sections. The sections include Nutrition Education and Wellness Promotion, Standards for USDA Child Nutrition Programs and School Meals, Nutrition Standards for Competitive and Other Foods and Beverages, Physical Education and Physical Activity, and Evaluation.

For each of the 50 policy items, school wellness policy statements are to be rated “0,” “1,” or “2,” using the definitions below. This evaluation tool lists each policy item followed by an explanation of the item and examples of “1,” “2,” “3,” and “4” statements. Ratings of “3” and “4” apply only to specific questions in Section 3: “Nutrition Standards for Competitive and Other Foods and Beverages”

Rating		Explanation
0	= Not Mentioned	The item is not included in the text of the policy.

1	= Weak Statement	<p>Assign a rating of "1" when the item is mentioned, <i>but</i>: The policy will be hard to enforce because the statement is <i>vague, unclear, or confusing</i>. Statements are listed as <i>goals, aspirations, suggestions, or recommendations</i>. There are <i>loopholes</i> in the policy that weaken enforcement of the item. The policy mentions a <i>future plan to act</i> without specifying when the plan will be established. Words often used include: <i>may, can, could, should, might, encourage, suggest, urge, some, partial, make an effort, and try</i>.</p>
2	= Meets / Exceeds Expectations	<p>Assign a rating of "2" when the item is mentioned, and it is clear that the policy makers are committed to making the item happen because: The item is described using specific language (e.g., a concept followed by concrete plans or strategies for implementation). Strong language is used to indicate that action or regulation is required, including: <i>shall, will, must, have to, insist, require, all, total, comply and enforce</i>. A district is unable to enforce an item (e.g., teachers role modeling healthy behaviors), but the goal is clearly stated (e.g., "shall encourage teachers to role model healthy behaviors").</p>
3	= Meets IOM standard	<p>Assign a rating of "3" when nutrients in foods and or beverages meet IOM standards.</p>
4	= School instituted ban	<p>Assign a rating of "4" when the item ban is mentioned.</p>

Evaluating Hint: One method for deciding between a rating of "1" and a "2" is to consider the scenario of a parent approaching a school district's board of education to discuss an issue. If the policy is ambiguous on how the school should handle the issue at hand, rate the item as "1." If the written policy gives clear guidance about how to decide whether the school complies with the policy, rate the item as "2."

State law may regulate items in this evaluation tool. State law supersedes the authority of school wellness policies, so unless otherwise indicated, rate items according to the strength of state law when state law exceeds standards in a policy or when state law mentions items not included in a policy. For example, if state law prohibits soda in schools but the policy does not; rate applicable items as if the policy explicitly prohibits soda.

How to Score School Wellness Policies

The WellSAT will give you two scores: a **comprehensiveness** score, which reflects the extent to which recommended content areas are covered in the policy; and a **strength** score, which describes how strongly the content is stated. Both scores range from 0-100, with lower scores indicating less content and weaker language, and higher scores indicating more content and use of specific and directive language.

Score	Explanation
Comprehensiveness Score by section	Comprehensiveness is calculated by counting the number of items in each section rated as "1" or "2," dividing this number by the number of policy items in the section, and multiplying this number by 100.
Strength Score by section	Strength is calculated by counting the number of items in each section rated as "2," dividing this number by the number of policy items in the section, and multiplying this number by 100.
Total Comprehensiveness	Total comprehensiveness is calculated by counting the number of items rated as "1" or "2," dividing this number by the total number of policy items (50) in all five sections, and multiplying this number by 100.
Total Strength	Total strength is calculated by counting the number of items rated as "2," dividing this number by the total number of policy items (50) in all five sections, and multiplying this number by 100.

The example below shows the calculation of sample scores for Section 1.

Section 1. Nutrition Education		Rating
NEW P1	Nutrition curriculum provided for each grade level.	0
NEW P2	Links nutrition education with the school food environment.	1
NEW P3	Nutrition education teaches skills that are behavior-focused.	2
NEW P4	Encourages staff to be role models for healthy behaviors.	1
NEW P5	Specifies district using Centers for Disease Control and Prevention's (CDC) Coordinated School Health Program (CSHP) model or other coordinated/comprehensive method.	0
NEW P6	Specifies how district will engage parents, students or community to provide information and hear feedback to meet district wellness goals.	0
NEW P7	Specifies marketing to promote healthy choices.	1
NEW P8	Specifies restricting marketing of unhealthful choices..	0
NEW	Establishes a health advisory committee or school health council that is ongoing beyond	2

P9	policy development.	
Subtotal for Section 1 Nutrition Education	Comprehensiveness Score <i>Count the number of items rated as "1" or "2" and divide this number by 9. Multiply by 100. Do not count an item if the rating is "0."</i>	56
	Strength Score <i>Count the number of items rated as "2" and divide this number by 9. Multiply by 100.</i>	22

Comprehensiveness Score = Three items are rated as "1" and two items are rated as "2," for a total of 5 items. Five divided by 9 equals 0.56, multiplied by 100 for a score of 56.

Strength Score= Two items are rated as "2." Two divided by 9 equals 0.22, multiplied by 100 for a score of 22.

In Section 3, item responses may vary if regulations are specific to elementary, middle and high schools. You can assign a score for each grade level. The final score for the item will be the average of the three responses given. Averages should be rounded up. Also in Section 3, several items are scored on a scale of 0-4. Items receiving a rating of "3" or "4" will be considered a rating of "2" for scoring purposes.

Section 1. Nutrition Education and Wellness Promotion

#	Item	Rating Guidance
NEWP1	Provides nutrition curriculum for each grade level.	<p>0</p> <p>For this item, integrating nutrition education into other subjects beyond health education does NOT qualify for a "1" or "2."</p> <p>Not mentioned</p> <p>Mentions "standards-based nutrition education" without mentioning curriculum/program.</p> <p>Addresses a "wellness curriculum" or health education curriculum without including nutrition/healthy eating as part of the curriculum components.</p>
		<p>1</p> <p>Weak statement</p> <p>Describes general health curriculum for "K-12" or "all levels," and/or is unclear if each grade will receive nutrition education.</p> <p>Example:</p> <p>"Enable students, through a comprehensive curriculum, to acquire the knowledge and skills necessary to make healthy food choices for a lifetime." (Not clear that nutrition education is actually taught at each grade level.)</p> <p>"Nutrition and physical activities lessons will be designed for integration into the curriculum and the health education program."</p>
		<p>2</p> <p>Meets or Exceeds Expectations</p> <p>Clear that district has a nutrition education curriculum in each grade.</p> <p>Example:</p> <p>"Nutrition topics shall be integrated within the comprehensive health education curriculum and taught at every grade level (K-12)."</p>

NEWP2	Links nutrition education with the school food environment	0	Not mentioned
		1	Vague and/or suggested Example: "The entire school environment, not just the classroom, shall be aligned with healthy school goals to positively influence a student's understanding, beliefs, and habits as they relate to good nutrition and regular physical activity."
		2	Requires that nutrition education be integrated into the larger school environment in concrete ways. Example: "The nutrition education program shall work with the school meal program to develop school gardens and use the cafeteria as a learning lab."
NEWP3	Nutrition education teaches skills that are behavior-focused.	0	Not mentioned, or only addresses knowledge acquisition
		1	Any of the following: Skill-based nutrition education is suggested. Specific behavioral skills are mentioned, but none are required. Skill-based health education is suggested outside of the nutrition education section of the policy. Examples: "All students should have the skills necessary to make nutritious food choices." "Students will receive nutrition education that fosters the adoption and maintenance of healthy eating behaviors."
		2	Either of the following: Skill-based nutrition education is required. Specific skills or activities are identified and required (e.g., media awareness, menu planning, reading nutrition facts labels). Examples: "Nutrition education will incorporate lessons helping children acquire skills for reading food labels and menu planning." "Schools will provide nutrition

			education lessons that cover topics such as reading a Nutrition facts label."
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NEWP4	Encourages staff to be role models for healthy behaviors.	0	Not mentioned
		1	Suggests that staff should be encouraged to model healthy behavior Example: "Each school in the district should encourage staff to model..."
		2	Requires that staff shall be encouraged to model healthy behavior Example: "Staff will be encouraged to model healthy eating and physical activity as a valuable part of daily life."
NEWP5	Specifies district using the Centers for Disease Control and Prevention's (CDC) Coordinated School Health Program model or other coordinated/comprehensive method	0	Not mentioned
		1	Mentions that district is considering or working toward use of a coordinated school health model Example "We will strive toward integrating nutrition into a coordinated school health approach."
		2	Includes language to institutionalize a coordinated school health model Example: "Schools will link nutrition education activities with the coordinated school health program."

NEWP6	Specifies how district will engage families to provide information and/or solicit input to meet district wellness goals (e.g., through website, e-mail, parent conferences, or events).	0	Not mentioned
		1	<p>Any of the following: Methods are vague. Specific methods are mentioned, but not required. Specific methods are mentioned, but it is unclear if the school will engage families.</p> <p>Examples: "Nutrition information and links to relevant resources in the community should be provided to families through newsletters, publications, health fairs, and other channels." "Feedback from parents should be encouraged through stakeholder meetings."</p>
		2	<p>Meets or Exceeds Expectations Clear that the district or schools will engage families, and specific methods are listed. Even if it is unclear that each method listed will be used, as long as engagement is required, rate as "2."</p> <p>Examples: "Nutrition education will be provided to parents in the form of handouts, the school website, articles and information provided in district or school newsletters, presentations that focus on nutrition and healthy lifestyles, and through any other appropriate means available to reach parents." "The school will consider student needs in planning for a healthy school nutrition environment. Students will be asked for input and feedback through the use of student surveys and attention will be given to their comments." "The food service director will be available to speak with parents during open house." "Parents will be provided the opportunity to give feedback on wellness goals."</p>

NEWP7	Specifies marketing to promote healthy choices.	0	Not mentioned
		1	Vague and/or suggested Example: "It is recommended that organizations operating concessions at school functions market healthy food choices at a lower profit margin to encourage student selection."
		2	Specific (posters, pricing structures, etc.) and required Example: "Schools shall label/mark healthy food items available so students know which are healthy items." "The healthiest choices, such as salads and fruit, will be prominently displayed in the cafeterias to encourage students to make healthy choices." "Healthy food options will be comparably priced."

NEWP8	Specifies restricting marketing of unhealthful choices	0	Not mentioned
		1	Weak Statement Restrictions are suggested or weakened by exceptions such as time, location, or a principal's discretion. Example: "Display and advertising of foods with minimal nutritional value is strongly discouraged on school grounds."
		2	Required Examples: "Education materials shall be free of brands and illustrations of unhealthful foods." "Soft drink logos are not allowed on school materials or on school property."

NEWP9	Establishes an advisory committee to address health and wellness that is ongoing beyond policy development.	0	Not mentioned
		1	Suggested and/or not clear that the committee will be ongoing Example: "A wellness policy committee will be formed in district XYZ."
		2	Committee is required and clearly ongoing Examples: "The Nutrition and Physical Activity Advisory Council shall include (stakeholders) and shall meet a minimum of two times annually to monitor and evaluate the implementation of the policy." "The school district will create, strengthen, or work within existing school health councils to develop, monitor, review, and revise nutrition and physical activity policies. The councils will serve as resources to school sites for implementing these policies."

Section 2. Standards for USDA Child Nutrition Programs and School Meals

#	Item	Rating Guidance
US1	Addresses access to and/or promotion of the School Breakfast Program (USDA).	0 Not mentioned Informing parents about the School Breakfast Program does NOT qualify for a "1" or "2."
		1 Either of the following: Promotes a breakfast program without specifying the "School Breakfast Program" (USDA) or CFR Part 220. Encourages or suggests participation in the School Breakfast Program. Examples: "The district shall make every effort to offer school breakfast." "The district shall operate under USDA regulations for school food programs (e.g., School Breakfast Program, National School Lunch Program, Special Milk Program, and Summer Food Service Program)."
		2 Meets or Exceeds Expectations Includes language to institutionalize the School Breakfast Program (e.g., specific reference to School Breakfast Program or CFR Part 220). Example: "All schools will provide breakfast through the USDA School Breakfast Program."
US2	Addresses nutrition standards for school meals beyond USDA (National School Lunch Program / School Breakfast Program) minimum standards . Note: USDA "school meals" include beverages served with the meal.	0 Note: U.S. Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) Dietary Guidelines for Americans exceed the minimum standards for the USDA school meals programs. Any of the following: Not mentioned. Unless defined, ambiguous references to federal or USDA standards/guidelines/requirements (e.g., "federal nutrition standards," "USDA standards," or "USDA guidelines") do NOT qualify for "1" or "2" because it is not clear that these standards refer to anything other than the minimum legal requirements for USDA school meals programs. "Striving to meet" or "should meet" the Dietary Guidelines does not qualify for a 1 or 2. Exploring increased use of whole grains or exploring including salads, yogurts and other healthy foods to the meal menu.

		1	<p>Either of the following: Vague and/or suggested. Specifies meeting the Dietary Guidelines for Americans and no other standards. To receive a "1" for specifying the Dietary Guidelines for Americans, a policy must at least state, "Dietary Guidelines."</p> <p>Examples:"Encourage the consumption and choice of nutrient-dense food, such as whole grains, fruits, and vegetables." "Should assist students to comply with the Dietary Guidelines for Americans." "...all meals will follow the food guide system developed by USDA" "...all foods sold/served on campus will meet USDA Dietary Guidelines" (and no other mention about school meal programs in the policy that would alter the coding for this item) "School meals promote fresh fruits, vegetables, whole grains, and low-fat items"</p>
		2	<p>Meets or Exceeds Expectations School meals are required to meet specific standards (e.g., 4 fruits and/or non-fried vegetables per day; only 1% and fat-free white milk served; at least half of grains are whole grain; eliminates trans fats, using low fat versions of foods or low-fat cooking methods). Example:"Milk sold as part of the school meals program will be limited to 1%, and skim, with no chocolate milk being served."</p>

US3	Specifies strategies to increase participation in school meal programs. ("School meal programs" can be assumed to refer to breakfast and/or lunch.)	0	<p>Not mentioned Notifying parents of eligibility requirements for free and reduced price meals is a federal requirement, does NOT qualify for "1" or "2."</p>
		1	<p>Mentions vague and/or suggested strategies Example:"School meals shall be made attractive to students by appealing to their taste preferences." "Meals shall be appealing..." "...bus schedules should be arranged to facilitate participation in the school"</p>

			<p>breakfast program."</p> <p>"The district has a closed campus policy unless the Principal provides permission for students to leave during the lunch period."</p> <p>"To the extent possible, school and transportation schedules shall be designed to encourage participation in school meal programs."</p>
		2	<p>Requires specific strategies: i.e. promotional mailings or events, alternative breakfast systems, altered bus schedules, closed campus, student input on the menu, or "Grab and Go" or "Fun on the Run" promotions.</p> <p>Examples: "Students will have the opportunity to provide input on local, cultural, and ethnic favorites."</p> <p>"Shall provide periodic food promotions to encourage taste testing of healthy new foods being introduced on the menu."</p> <p>"Morning bus routes will be scheduled to allow students to arrive at school in time to eat breakfast." "Students are prohibited from leaving campus for lunch."</p>
US4	Ensures adequate time to eat.	0	Not mentioned
		1	<p>Vague and/or suggests a specific amount of time</p> <p>Examples: "Schools are encouraged to permit all full-day students a daily lunch period of not less than 20 minutes."</p> <p>"Personnel will schedule enough time so students do not have to spend too much time waiting in line."</p>
		2	<p>Meets or Exceeds Expectations</p> <p>Requires meal periods to include at least 20 minutes for lunch and, if time for breakfast is mentioned, at least 10 minutes for breakfast.</p> <p>Examples: "After obtaining food, students will have at least 20 minutes to eat lunch."</p> <p>"Students will be provided adequate time (minimum of 20 minutes) to eat lunch."</p> <p>"The school district will provide students with a min. of 20 minutes to eat their meals."</p>
US5	Ensures nutrition training for	0	Not mentioned or only mention food

	food service director and/or onsite manager (or other person responsible for menu planning).		safety training
		1	Any of the following: Vague and/or suggested. Professional development offered, but unclear if nutrition is covered. Training encouraged for food service director only (works off-site) Example: "All food service personnel will have adequate training in food service operations." "Professional development training will be offered for all interested faculty and staff."
		2	2 - Nutrition training is specified for onsite manager and/or the food service director. Example: "Shall ensure that professional development in the area of food and nutrition is provided for food service managers and staff."
US6	Addresses school meal environment.	0	Not mentioned
		1	Vague and/or suggested. Example: "...will strive to make the cafeteria a pleasant environment for meals."
		2	Meets or Exceeds Expectations Requires specific strategies (ensures adequate space/seating, supervision, a clean, pleasant environment, etc.) Examples: "Appropriate supervision shall be provided in the cafeteria and rules for safe behavior shall be consistently enforced." "Students shall be provided a pleasant environment in which to eat lunch."
US7	Nutrition information for school meals (e.g., calories, saturated fat, sugar) is available.	0	Not mentioned
		1	Either of the following: Vague and/or suggested. Only available upon request. Example: "Will provide nutrition information to parents upon request."
		2	Specific and required Example: "Will share and publicize information about

			the nutritional content of meals with students and parents."
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Section 3. Nutrition Standards for Competitive and Other Foods and Beverages

Note: This section relates to sale or service of foods outside USDA school meals. Do not count provisions in the USDA school meals section of the policy for items in this section. If a school wellness policy contains a statement regulating "all foods" at school, and it is unclear from the context of the policy whether the statement applies to competitive foods or USDA school meals, apply the statement to this section (Nutrition Standards for Competitive and Other Foods and Beverages) and to section 2 (Standards for USDA Child Nutrition Programs and School Meals). Some policies regulate foods "served" at school, while others only regulate foods "sold" at school. The distinction between "served" and "sold" is that "served" includes both foods that are "sold" and foods that are distributed without cost, such as foods served at birthday parties. Most items in this section refer to foods sold, but some refer to the broader category of foods served. For a policy to receive a minimum default rating for mentioning U.S. Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) Dietary Guidelines for Americans, the policy must state "Dietary Guidelines."

A regulation with a time exception is one that only applies during certain hours (e.g., when class is in session or during lunch).

A regulation with a location exception is one that only applies to certain places or grade levels (e.g., in cafeteria or middle school).

Note: Item responses may vary if regulations are specific to elementary, middle and high schools. You can assign a score for each grade level. The final score for the item will be the average of the three responses given, rounded up.

#	Item	Rating Guidance	
NS1	Regulates vending machines	N/A	Our school district does not have this grade level
		0	Either of the following: No mention of vending machine regulations or no umbrella statement regulating "all foods", "competitive foods" or "foods served outside USDA meals". Only mention efforts to minimize sale of Foods of Minimal Nutritional Value.
		1	Any of the following: Vending machine regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions. The 2005 Dietary Guidelines for Americans and no other standards are mentioned to regulate vending machines or "all (competitive) foods." Regulations only apply to a very limited

		<p>group of foods (e.g., prohibiting Foods of Minimal Nutritional Value in vending machines).</p> <p>Mentions only state guidelines regulating vending machine sales (and does not clarify what the state guideline is).</p> <p>Restrictions only apply to a percentage of food and/or beverage items or a limited set of items (e.g., fat content and soda).</p> <p>Mentions regulating food and beverages in vending machines without specifying guidelines or mentions plans to create guidelines.</p> <p>Examples:"Vending machines shall include items which are healthful."</p> <p>"Vending machines shall be unplugged during lunch hour."</p> <p>"Vending machine sales are in accordance with the state Public School Nutrition Policy."</p> <p>"Food and beverage sales in vending machines will support healthy eating."</p> <p>"All food and beverages sold will strive to support the district's healthy eating guidelines."</p> <p>"The sale of food items during the school day shall be restricted to those items in categories of food that meet minimal nutritional value."</p> <p>"The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or served to students."</p> <p>"A minimum of 75% of food and beverages sold in vending machines must meet district nutrition standards."</p> <p>"A minimum of 20% of snacks in vending machines, school stores, concession, and a la carte will be considered healthy snack offerings."</p> <p>"Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with USDA standards shall be established for all foods offered by the district's nutrition services department or contracted vendors."</p>
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			"The district shall monitor all food and beverages sold or served to students."
NS1	Regulates vending machines	2	<p>Any of the following: Regulate nutritional quality of ALL items sold (e.g., regulating maximum calorie, sugar, and saturated fat content of ALL items sold); Provide a specific and restricted list of food items allowed to be sold in vending machines or at all times (e.g., limiting vending to only water, fruits, vegetables, whole grains, and nuts); Prohibit a comprehensive list of unhealthy foods (e.g., baked goods, sweetened beverages, and candy) in vending machines or at all times.</p> <p>Examples:Foods sold through vending machines shall be limited to water, 100% juice, and fresh fruits and/or vegetables. All items sold through vending machines shall contain no more 35% of total calories from fat and sugars and no trans fats.</p>
NS1	Regulates vending machines	3	<p>Bans vending machines or bans all competitive foods Examples:The sale of food and beverages is limited to those sold through the school meal program. Vending machines are prohibited on school grounds.</p>
NS2	. Regulates school stores. Note: If policy only mentions concessions or snack bars, do not code for school stores, unless policy defines concessions and/or snack bars as including school stores.	N/A	<p>Note: If policy regulates "all foods" or "competitive foods," rate according to the strength of that statement. Our school district does not have this grade level</p>
		0	<p>Either of the following: No mention of school store regulations or no umbrella statement regulating "all foods", "competitive foods" or "foods served outside USDA meals". Efforts to minimize sale of Foods of Minimal Nutritional Value</p>
		1	<p>Any of the following: School store regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, time- or location- specific, subject to principal's</p>

		<p>discretion, or weakened by other exceptions.</p> <p>The 2005 Dietary Guidelines for Americans and no other standards are mentioned to regulate school stores or "all (competitive) foods."</p> <p>Regulations only apply to a very limited group of foods (e.g., prohibiting Foods of Minimal Nutritional Value in school stores). Restrictions only apply to a percentage of food and/or beverage items or a limited set of items (e.g., fat content and soda).</p> <p>Language such as: "The district shall monitor all food and beverages sold or served to students, including those available outside of the federally regulated child nutrition programs (i.e., a la carte, vending, student stores, rewards, fundraising, etc.).</p> <p>Any language such as "...should strive to sell healthy food and beverages in school stores."</p> <p>Examples: "...ensure some healthy options are sold at school stores."</p> <p>"Sales of food and beverages in school stores must comply with state Public School Nutrition Policy."</p> <p>"..school stores shall strive to include healthy choices for sale..."</p> <p>"All food and beverages sold will strive to support the district's healthy eating guidelines."</p> <p>"The sale of food items during the school day shall be restricted to those items in categories of food that meet minimal nutritional value."</p> <p>"The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or served to students."</p> <p>"...50% of food and beverages sold in stores must meet the district nutrition standards."</p> <p>"Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with USDA standards shall be established for all</p>
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			foods offered by the district's nutrition services department or contracted vendors."
NS2	<p>Regulates school stores. Note: If policy only mentions concessions or snack bars, do not code for school stores, unless policy defines concessions and/or snack bars as including school stores.</p>	2	<p>Any of the following: Regulate nutritional quality of each individual item sold (e.g., regulating maximum calorie, sugar, and saturated fat content of ALL items sold). Provide a specific and restricted list of food items allowed to be sold in school stores or at all times (e.g., limiting food sales to only water, fruits, vegetables, whole grains, and nuts). Provide a comprehensive list of prohibited unhealthy foods (e.g., baked goods, sweetened beverages, and candy) in school stores or at all times. Examples: Foods sold through school stores shall be limited to water, 100% juice, and fresh fruits and/or vegetables. All items sold through school stores shall contain no more 35% of total calories from fat and sugars and no trans fats.</p>
		3	<p>Bans food/beverage sales in school stores or there is a competitive food ban Examples: The sale of food and beverages is limited to those sold through the school meal program. District XYZ does not allow food/beverages to be sold at school stores.</p>
NS3	<p>. Regulates food service a la carte OR food sold as an alternative to the reimbursable school meal program (if not defined as to what this means).</p>	N/A	<p>Note: If policy regulates "all foods" or "competitive foods," rate according to the strength of that statement. If the policy addresses food and/or beverage sold by food service program /child nutrition programs, etc., but the policy is silent on a la carte, give credit for a la carte</p> <hr/> <p>Our school district does not have this grade level</p>
		0	<p>Either of the following: No mention of a la carte regulations or no umbrella statement regulating "all foods", "competitive foods" or "foods served outside USDA meals".</p>

			<p>Efforts to minimize sale of Foods of Minimal Nutrition Value</p> <p>Any of the following: A la carte regulations or umbrella statement regulating "all (competitive) foods" is vague, suggested, or weakened by exceptions such as a time, location, or a principal's discretion. The 2005 Dietary Guidelines for Americans and no other standards are mentioned to regulate food service a la carte or "all (competitive) foods." Restrictions only apply to a percentage of food and/or beverage items or a limited set of items (e.g., fat content and soda, for example). Language such as: "The district shall monitor all food and beverages sold or served to students, including those available outside of the federally-regulated child nutrition programs (i.e., a la carte, vending, student stores, etc.)." Language such as: "...should strive to sell healthy a la carte food and beverages." Mentions regulating a la carte/all food and beverages without specifying guidelines or mentions plans to create guidelines. Examples:"All food and beverages sold will strive to support the district's healthy eating guidelines." "Food service shall strive to include some healthy choices for all a la carte food sales" (and lists them). "The sale of food items during the school day shall be restricted to those items in categories of food that meet minimal nutritional value." "The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or served to students." "...50% of a la carte food and beverage items must meet district nutrition standards." "Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with</p>
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			USDA standards shall be established for all foods offered by the district's nutrition services department or contracted vendors."
NS3	. Regulates food service a la carte OR food sold as an alternative to the reimbursable school meal program (if not defined as to what this means).	2	<p>Any of the following: Regulate nutritional quality of ALL a la carte items sold (e.g., regulating maximum calorie, sugar, or saturated fat content of ALL items sold). Provide a specific and restricted list of food items allowed to be sold a la carte or at all times (e.g., limiting food sales to only fruits, vegetables, and whole grains). Provide a comprehensive list of prohibited unhealthy foods (e.g., baked goods, sweetened beverages, and candy) a la carte or at all times. Examples:A la carte food and beverage sales shall be limited to water, 100% juice, and fresh fruits or vegetables. All items sold through school stores shall contain no more 35% of total calories from fat and sugars and no trans fats</p>
		3	<p>Bans a la carte food sales or there is a competitive food ban Examples:The sale of food and beverage is limited to those sold through the school meal program. District XYZ does not allow a la carte food/beverage sales.</p>
NS4	Regulates food served at class parties and other school celebrations.	N/A	Our school district does not have this grade level
		0	Not mentioned
		1	<p>Any of the following: Regulation for class parties or umbrella statement regulating "all (competitive) foods" served at school is vague, suggested, or weakened by exceptions such as time, location, or a principal's discretion. The 2005 Dietary Guidelines for Americans and no other standards are mentioned to regulate class parties or "all (competitive) foods served." Regulations only apply to a very limited group of foods (e.g., prohibiting Foods of</p>

			<p>Minimal Nutritional Value at all times). Regulations for class parties are required but weakened (e.g., by allowing one traditional party food).</p> <p>Examples:"District encourages healthy snacks at parties."</p> <p>"Celebrations involving food during the school day shall be at the discretion of the school principal."</p> <p>"The school food environment (including celebrations) on balance and over time should be consistent with healthy food guidelines."</p> <p>"...permits only one birthday party per month."</p> <p>"The district shall provide parents with a list of foods that meet the Board's snack standards for healthy celebrations/parties, rewards, and fundraising activities" (and no other mention of celebrations/parties included in the policy)</p> <p>"The district should regulate all food and beverages sold/served as part of classroom activities."</p> <p>"Classroom parties will offer minimal amounts of foods (maximum 2-3 items) that contain added sugar as the first ingredient and will provide the following: fresh fruits and vegetables, water, 100% fruit juice or milk"</p> <p>"Classroom parties, celebrations, etc. shall be limited to one snack and one beverage (100% juice, water, or milk)."</p> <p>"The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or served to students."</p> <p>"Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with USDA standards shall be established for all foods offered by the district's nutrition services department or contracted vendors."</p>
NS4	Regulates food served at class parties and other school celebrations.	2	<p>Any of the following:</p> <p>Regulate nutritional quality of each individual item served/distributed/available</p>

			<p>at class parties (e.g., regulating maximum calorie, sugar, or saturated fat content of ALL items).</p> <p>Provide a specific and restricted list of food items allowed to be served/distributed/available at class parties or at all times (e.g., limiting to fruits and whole grains).</p> <p>Prohibit a comprehensive list of unhealthy foods (e.g., baked goods, sweetened beverages, and candy) from being served/distributed/available at class parties/celebrations or at all times.</p> <p>Example:</p> <p>"Foods and beverages served at school celebrations must meet the District's Nutritional Standards," (and standards are defined).</p>
NS4	Regulates food served at class parties and other school celebrations.	3	<p>No Food Allowed at Class Celebrations or there is a competitive food ban</p> <p>Example:</p> <p>"Classroom celebrations will focus on activities, rather than food. No food will be served."</p>
NS5	Addresses limiting sugar content of foods sold/served outside of USDA meals.	N/A	our school district does not have this grade level
		0	<p>Not mentioned</p> <p>If policy specifies Dietary Guidelines for Americans and no other standards, rate as "0." A policy that just regulates /limits candy does NOT qualify for a rating of "1" or "2."</p>
		1	<p>Any of the following:</p> <p>Limit is not quantified.</p> <p>Limit is suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions.</p> <p>Restrictions on sugar only apply to a percentage of food item.</p> <p>Examples:</p> <p>"Dry snacks sold at the K-8 level shall follow District Nutrition Standards minimizing the content of sugar."</p> <p>"Prohibits foods listing sugar, corn syrup,</p>

			<p>or other caloric sweeteners as the first ingredient."</p> <p>"Schools shall discourage consumption of sugary foods."</p> <p>"The district will encourage students to make nutritious food choices and will ensure that...schools regulate the sale of foods high in...added sugars."</p> <p>"The district shall consider sugar content, fat content, portion size, and lack of nutrients in all F&B sold or served to students."</p> <p>"...50% of food items sold must prohibit sugar as the first ingredient"</p> <p>"Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with USDA standards shall be established for all foods offered by the district's nutrition services department or contracted vendors."</p>
NS5	Addresses limiting sugar content of foods sold/served outside of USDA meals.	2	<p>Quantified and required limit of >35% of total calories/total weight from sugar</p> <p>Example:</p> <p>"Food sold outside the school meal program must contain no more than 40% of total calories/total weight from sugar."</p>
		3	<p>Meets Institute of Medicine standard: ≤ 35% of total calories/weight from sugar</p> <p>Example:</p> <p>"K-12 school food service, school store, and school vending machines sale of individual snack items per package shall include no more than 35% total calories/weight from sugar."</p>
		4	Competitive food ban
NS6	Addresses limiting fat content of foods sold/served outside of USDA meals.	N/A	Our school district does not have this grade level or does not have vending, school store, etc.

			0	<p>Either of the following: Not mentioned Indicates that schools shall "strive" to/"should" meet the Dietary Guidelines. Example: "...must include items that meet the 2005 Dietary Guidelines for Americans."</p>
			1	<p>Any of the following: Limit is not quantified. Limit is suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions. Specifies the 2005 Dietary Guidelines for Americans and no other standards (applies to all food items). Restrictions on fat content only apply to a percentage of food items. Examples: "All food and beverages available to students at school are recommended to be food items low in fat." "The district will encourage students to make nutritious food choices and will ensure that...schools regulate the sale or serving of foods high in fat, sodium, or added sugars." "The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or served to students." "...50% of food items must contain no more than 40% of total calories from fat." "Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with USDA standards shall be established for all foods offered by the district's nutrition services department or contracted vendors."</p>

NS6	Addresses limiting fat content of foods sold/served outside of USDA meals.	2	<p>Quantified and required limit but > 35% total calories from fat</p> <p>Example:</p> <p>"Food and beverages sold outside the school meal program must contain no more than 40% of total calories/weight from fat."</p> <p>"No individual food item can exceed 8 grams of fat per serving."</p>
NS6	Addresses limiting fat content of foods sold/served outside of USDA meals.	3	<p>Meets Institute of Medicine standard: ≤ 35% of total calories from fat</p> <p>Example:</p> <p>"K-12 school food service, school store, and school vending machine sale of individual snack items per package shall include no more than 35% of calories from fat and nine grams maximum per serving with the exception of nuts."</p>
		4	<p>Competitive food ban</p> <p>Example:</p> <p>"Competitive foods and beverages may not be sold on school campuses during the school day."</p>
NS7	Addresses limiting sodium content of foods sold/served outside of USDA meals.	N/A	<p>Our school district does not have this grade level</p>
		0	<p>Either of the following:</p> <p>Not mentioned</p> <p>Indicates that schools shall "strive" to meet or "should" meet the USDA Dietary Guidelines.</p> <p>Example: "...must include items that meet the 2005 Dietary Guidelines for Americans."</p>
		1	<p>Any of the following:</p> <p>Limit is not quantified.</p> <p>Limit is suggested, time- or location-specific, subject to principal's discretion, or weakened by other exception.</p> <p>Specifies the 2005 Dietary Guidelines for Americans and no other standards (applies to all food items).</p> <p>Restrictions on sodium only apply to a percentage of food items.</p>

			<p>Examples:"Foods to avoid—consume only occasionally: high sodium foods (luncheon meats, cheeses, salty popcorn, pickles)."</p> <p>"The district will encourage students to make nutritious food choices and will ensure that...schools regulate the sale or serving of foods high in fat, sodium, or added sugars."</p> <p>"...50% of food items must contain no more than 600mg of sodium."</p> <p>"Nutrition guidelines that require the use of products that are high in fiber, low in added fats, sugar, sodium, and served in appropriate portion sizes consistent with USDA standards shall be established for all foods offered by the district's nutrition services department or contracted vendors."</p>
NS7	Addresses limiting sodium content of foods sold/served outside of USDA meals.	2	<p>Quantified and required limit but is > 200 mg/portion</p> <p>Example:</p> <p>"A snack food item sold individually shall contain no more than 240 mg of sodium per serving."</p>
		3	<p>Meets Institute of Medicine standard: ≤ 200 mg/portion for snacks</p> <p>Example:</p> <p>"A snack food item sold individually shall contain no more than 200 mg of sodium per serving."</p>
		4	Competitive food ban
NS8	Addresses limiting calorie content per serving size of foods sold/served outside of USDA meals.	N/A	Our school district does not have this grade level
		0	<p>Not mentioned</p> <p>If policy specifies the current Dietary Guidelines for Americans and no other standards, rate as a "0." Limiting calories from fat, sugar, or any other group of nutrients does not qualify for a rating of "1" or "2." Provisions related to limiting "additional caloric sweeteners" also do not qualify for a rating of "1" or "2."</p>
		1	<p>Any of the following:</p> <p>Limit is not quantified.</p>

			<p>Limit is suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions.</p> <p>Restrictions only apply to a percentage of food items.</p> <p>Examples: "Foods sold outside of the National School Lunch Program shall contain a reasonable number of calories per package."</p> <p>"...50% of food items must contain no more than 300 calories/serving."</p>
		2	<p>Quantified and required limit but > 200 calories/per serving</p> <p>Example: "Individually sold snack items shall not exceed 240 calories per package."</p>
		3	<p>Meets Institute of Medicine standard: ≤ 200 calories/serving</p> <p>Example: "Individually sold snack items shall not exceed 200 calories per package."</p>
		4	<p>Competitive food ban</p> <p>Example: "Competitive foods and beverages may not be sold on school campuses during the school day."</p>

NS9	Addresses increasing "whole foods" (whole grains, unprocessed foods, or fresh produce) sold/served outside of USDA meals.	N/A	our school district does not have this grade level
		0	<p>Any of the following:</p> <p>Not mentioned</p> <p>Mentions only dried fruit, fruit juice, fruit roll-ups, etc.</p> <p>Indicates that schools shall "strive" to meet or "should" meet the USDA Dietary Guidelines.</p> <p>Reference to whole grains, fresh fruits, etc., only relative to school meals.</p> <p>Mentions only high-fiber items.</p> <p>Examples: "...must include items that meet the 2005 Dietary Guidelines for Americans."</p>
		1	<p>Any of the following:</p> <p>Encourages offering/consumption of whole grains, unprocessed foods, or fresh produce.</p> <p>Farm-to-School program is suggested.</p> <p>Specifies the current Dietary Guidelines for Americans and no other standards.</p> <p>List of food items includes fruits/vegetables</p>

			that may include but are not limited to a list of items including non-fresh fruits/vegetables (e.g., dried/canned fruits/vegetables). Examples: "Schools are encouraged to make available locally grown produce to students for all school meals and food items sold outside of the reimbursable school meal program." "Schools are encouraged to source fresh fruits and vegetables from local farmers where practical."
		2	Either of the following: Definitively offering whole grains, unprocessed foods, or fresh produce Farm to School program is required or definitively in place Examples: "At least half of the grains served will be whole grains." "Only brown rice shall be served." "Produce from area farms shall be sold/served at all locations where food and beverages are sold/served."
NS10	Addresses food not being used as a reward.	N/A	Our school district does not have this grade level
		0	Any of the following: Not mentioned Encourages the use of healthy food as a reward. Discourages using unhealthy food as a reward (e.g., donuts, Foods of Minimal Nutritional Value, etc.). Use of food as a reward in instructional programs shall require superintendent approval. Examples: "The district will provide teachers with guidelines on the use of food as a reward without specifying guidelines." "Staff is encouraged to limit the use of non-nutritious food as a reward/incentives and to promote nutritious options."
NS10	Addresses food not being used as a reward.	1	Any of the following: Discourages food as a reward Only allows healthy food as a reward Examples: "...strongly discourage the use of food/beverages as a reward or punishment." "...will encourage non-food alternatives as

				rewards." "Only healthy foods will be used as a reward." "Food should not be used as a reward." "Schools are encouraged to not use food or beverages that do not meet the nutrition standards for food and beverages sold individually as rewards." "Teachers shall not use food as a reward, especially those that do not meet the nutrition standards."
			2	Prohibits food as a reward. Prohibition of food as a reward with the exception of Individual(ized) Academic Plans (IAP) or Individual(ized) Education Plans (IEP) still qualifies for a rating of "2." Examples: "Food rewards or incentives shall not be used in classrooms to encourage student achievement or desirable behavior." "The use of food or candy as a classroom reward for any school is prohibited."

NS11	Addresses limiting sugar content of beverages sold/served outside of USDA meals. (If the policy specifies guidelines for limiting added sugar in food, do not assume these guidelines apply to beverages).		N/A	Our school district does not have this grade level
			0	Any of the following: Not mentioned. Indicates that competitive beverages "should include" specific beverage items. Examples: "Competitive beverages should include milk, water, and 100% juice."
			1	Any of the following: Limit is not quantified/specific. Limit is suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions. Restriction only applies to a percentage of beverages. Indicates that competitive beverages "must/shall include" specific beverage items (which includes 100% juice). Examples: "...discourages sugar-laden beverages." "...50% of beverages must contain no caloric sweeteners." "The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or

NS11	Addresses limiting sugar content of beverages sold/served outside of USDA meals. (If the policy specifies guidelines for limiting added sugar in food, do not assume these guidelines apply to beverages).		served to students." "50% of beverages must be 100% juice, milk, water, and electrolyte replacement drinks.
		2	Limit is quantified/specific, but beverages other than water, 100% juice and milk are allowed. Examples: "Beverages sold outside the school meal program must contain no more than 40% of total calories/total weight from sugar." Sweetened teas, sports drinks, juice drinks and other beverages may not contain more than 66 calories per 8 oz serving. Flavored milk may contain no more than 4 g of sugar per oz. "...shall prohibit soda and allow only water and beverages that are at least 50% juice."
		3	Meets Institute of Medicine Standard: Prohibits beverages other than water, 100% fruit or vegetable juice, and flavored milk with no more than 22g total sugar per 8 oz. Examples: "Beverages with added sugars are not allowed." "Only water and 100% juice will be allowed at school." "Prohibits the sale of beverages with additional caloric sweeteners."
		4	Competitive food ban Example: "Competitive foods and beverages may not be sold on school campuses during the school day."

NS12	Addresses limiting regular (sugar-sweetened) soda sold/served outside of USDA meals. (If the policy specifies guidelines for limiting added sugar in food, do not assume these guidelines apply to beverages).	N/A	Our school district does not have this grade level
		0	Any of the following: Not mentioned. Only prohibits Foods of Minimal Nutritional Value during meal times, or indicates that they should not be used as a source of revenue for the food service program. Encourages minimizing Foods of Minimal

NS12	Addresses limiting regular (sugar-sweetened) soda sold/served outside of USDA meals. (If the policy specifies guidelines for limiting added sugar in food, do not assume these guidelines apply to beverages).		Nutritional Value on school campuses. Example: "The food service program shall strive to be financially self-supporting; however, if it is necessary to subsidize the operation, it will not be through the sale of Foods of Minimal Nutritional Value."
		1	Any of the following: Regular soda is limited but not prohibited. Prohibition of regular soda is suggested, time- or location-specific, or overridden by principal's discretion. Restriction only applies to a percentage of beverages. Examples: "If available, food and beverages sold individually should be limited to low-fat and non-fat milk, fruits, and non-fried vegetables." "At least 50% of beverages must be 100% juice, milk, water, and electrolyte replacement drinks."
		2	Any of the following: Regular soda is prohibited. Foods of Minimal Nutritional Value are prohibited at all times on school grounds (the definition of Foods of Minimal Nutritional Value includes soda). Soda is prohibited except for use by the school nurse. Example: "Soda will not be available on school grounds."
		3	Meets Institute of Medicine Standard: Beverages with added caloric sweeteners are prohibited Examples: "Only milk, water, and 100% juice will be available at school." "Approved beverages: milk, milk products, 100% juice, and water."
		4	Competitive food ban Example: "Competitive food and beverages may not be sold on school campuses during the school day."
NS13	Addresses limiting fat content of milk sold/served outside of school meals. (If the policy addresses limiting the fat content of foods, do	N/A	Our school district does not have this grade level
		0	Not mentioned Mentioning nonfat or low-fat dairy products/foods does not qualify for a rating

NS13	not assume these policies apply to milk).			of "1" or "2." If policy explicitly allows whole milk, code as a "0."
			1	Full-fat milk is prohibited, but only reduced-fat (2%) milk is available. Example: "Schools shall provide reduced-fat milk where beverages are sold."
		Addresses limiting fat content of milk sold/served outside of school meals. (If the policy addresses limiting the fat content of foods, do not assume these policies apply to milk).	2	Any of the following: Full-fat milk is prohibited, but reduced-fat (2%) and low-fat (1%) or skim milk are available. Policy mentions that non-fat/skim, low-fat (1%), are "offered," or "provided" without specifying "only." Limiting milk to only low-fat (1%) or non-fat/skim is specified but suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions. Examples: "In high school, reduced fat, low-fat or skim milk may be sold." "Schools shall offer fat-free milk where beverages are sold." "At least 50% of beverage selections shall be 100% fruit juice, low fat or fat-free milk, and unflavored or unsweetened water."
			3	Meets Institute of Medicine standard: only low-fat (1%) or non-fat/skim milk is allowed Example: "District schools will sell only low-fat milk."
			4	Competitive food ban Example: "Competitive foods and beverages may not be sold on school campuses during the school day."
NS14	Addresses serving size limits for beverages sold/served outside of school meals.		N/A	Our school district does not have this grade level
			0	Not mentioned If policy specifies the 2005 Dietary Guidelines for Americans and no other standards, rate as a 0.
			1	Either of the following: Limit for drinks other than water is greater than 12 ounces.

			<p>Limit is suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions.</p> <p>Examples: "All beverages other than water and milk shall be 12 oz. or less."</p> <p>"The district shall consider sugar content, fat content, portion size, and lack of nutrients in all food and beverages sold or served to students."</p>
NS14	Addresses serving size limits for beverages sold/served outside of school meals.	2	<p>Limit for drinks other than water is > Institute of Medicine standards, but no more than 12 ounces/serving</p> <p>Example: "Juice will be served to elementary school students in 6-ounce containers."</p>
		3	<p>Meets Institute of Medicine standards (must meet ALL standards to be rated as a "3"):</p> <p>Water any size; AND</p> <p>8 oz./serving for milk (including flavored milk); AND</p> <p>Elementary and middle school- Juice: 4 oz./serving for 100% juice;</p> <p>High school- Juice: 8 oz./serving for 100% juice.</p> <p>Example: "District schools will follow the Institute of Medicine's recommendations for beverage serving sizes."</p>
		4	<p>Competitive food ban</p> <p>Example: "Competitive foods and beverages may not be sold on school campuses during the school day."</p>
NS15	Addresses access to free drinking water.	N/A	<p>Our school district does not have this grade level</p>
		0	<p>Any of the following:</p> <p>Not mentioned.</p> <p>Policy only addresses the sale of bottled water.</p> <p>Providing access to drinking water/fountains only during meal periods/in the cafeteria.</p> <p>Allowing students to bring in bottled water from home.</p> <p>Only addresses water available in the context of physical education/physical activity.</p>

			<p>Examples: "Schools should ensure that students have access to appropriate hydration and are encouraged to make use of it during physical activity." "Students will have access to a drinking fountain during meals."</p>
		1	<p>Availability of free water is suggested or encouraged Examples: "Water shall be accessible during hours of school operation through choices such as drinking fountains or vending machines." "Schools are encouraged to provide drinking fountains throughout the school campus."</p>
		2	<p>Free water is always available Example: "Students and staff will have access to free, safe, and fresh drinking water throughout the school day." "Drinking water fountains will be made available to students and staff throughout the school building." "Students will be provided access to drinking water throughout the day."</p>
NS16	Regulates food sold for fundraising at all times (not only during the school day).	N/A	<p>Note: Must specifically address "fundraising" for a rating of a "1" or "2." Regulating "all foods" during "the school day" or "at all times on school grounds" does NOT qualify for a rating of "1" or "2" because fundraising can occur off school grounds (e.g., catalogue orders for candy or cookie sales). Our school district does not have this grade level</p>
		0	<p>Any of the following: No mention of nutrition standards for food sold for fundraising. Strives to/should meet the 2005 Dietary Guidelines for Americans. Mentions regulating food and beverages sold for fundraising/all food and beverages without specifying guidelines, Mentions plans to establish guidelines for school-sponsored fundraising that involves selling food without mentioning guidelines, healthy food, etc.</p>

NS16	Regulates food sold for fundraising at all times (not only during the school day).	1	<p>Any of the following: Regulations of food sold for fundraising are vague, suggested, time- or location-specific, subject to principal's discretion, or weakened by other exceptions. The 2005 Dietary Guidelines for Americans and no other standards are mentioned to regulate food sold for fundraising. Regulations of food sold for fundraising only apply to a limited group of foods (e.g. prohibiting Foods of Minimal Nutrition Value) or a percentage of items sold. Examples: "...strongly encouraging the use of only non-food items to raise funds." "...requiring administrative approval for all fundraisers." "The district shall provide parents with a list of foods that meet the Board's snack standards for healthy celebrations/parties, rewards, and fundraising activities" (and no other language related to fundraising is included in the policy). "Fundraising activities will strive to support healthy eating and wellness."</p>
			2 <p>Any of the following: Regulate nutritional quality of each individual item sold for fundraising (e.g., regulating maximum calorie, sugar, or saturated fat content of ALL items sold). Provide a specific and restricted list of food items allowed to be sold for fundraising (e.g., limiting sales to water, fruits, vegetables, whole grains, nuts). Provide a list of prohibited unhealthy foods (e.g., baked goods, sweetened beverages, candy) from being sold for fundraising. Prohibits the sale of food for fundraising. Example:" Foods purchased to raise funds must also meet the District's Nutrition Standards" – and standards are defined.</p>

Section 4. Physical Education and Physical Activity

Many states list National Association for Sport & Physical Education (NASPE) standards. Only rate a "2" for items with NASPE defaults if district actually requires schools to follow NASPE standards, and it is clear from the context of the statement that NASPE standards apply to those items. If NASPE standards are suggested, rate as "1."

#	Item	Rating Guidance
PEPA1	Addresses written physical education curriculum/program for each grade level.	<p>0</p> <p>Either of the following: Not mentioned. Physical education is included in the health education curriculum. Example: "Division health education curriculum standards and guidelines address both nutrition and physical education."</p>
		<p>1</p> <p>Any of the following: Unclear if each grade has a physical education curriculum/program. A curriculum is identified but limited to only some grade levels. Addresses minimum amount of time for physical education but does not mention curriculum/program. Example: "Physical education will be provided in K-8" (in a district that extends beyond grade 8).</p>
		<p>2</p> <p>Either of the following: Clear that district has a written physical education curriculum/program for each grade (e.g., policy describes a general physical education curriculum/program for "K-12," "all levels," or "all students"). Clear that written physical education program is provided for "K-12," "all levels" or "all grades," and mentions time requirements (without using the word "curriculum"). Example: "The Physical Education Committee will submit for approval a K-12 comprehensive curriculum/program. All students in grades 1-5 will be scheduled for physical education instruction in accordance with state law. All students in grades 6-8 and 9-11 shall participate in the instructional program of physical education. Physical education in grade 12 is an elective."</p>

PEPA2	Addresses time per week of physical education for elementary school students.	N/A	My district does not have an elementary school
		0	Not mentioned
PEPA2	Addresses time per week of physical education for elementary school students.	1	Any of the following: Suggests but does not require 150 minutes/week. Specifies total amount of physical education, but it is less than 150 minutes/week. Suggests that schools follow NASPE standards. Specifies number of classes per week without duration. Time is specified for overall physical activity that specifically includes physical education. Example: "Schools will use NASPE standards as a guide when planning physical education classes."
		2	Either of the following: Requires 150 minutes/week or more of physical education. Requires schools to follow NASPE standards. Example: "Students shall receive 150 minutes per week of physical education instruction, per NASPE guidelines."
PEPA3	Addresses time per week of physical education for middle school students.	N/A	My district does not have a middle school
		0	Not mentioned
		1	Any of the following: Suggests but does not require 225 minutes/week. Specifies total amount of physical education, but it is less than 225 minutes/week. Suggests that schools follow NASPE standards. Specifies number of classes per week without duration. Time is specified for overall physical

				activity that specifically includes physical education. Example: "Schools will make an effort to plan classes so that students may participate in physical education daily."
			2	Either of the following: Requires 225 minutes/week or more of physical education. Requires schools to follow NASPE standards. Example: "The school district requires that all middle and high school students receive 225 minutes of physical education instruction per week."
PEPA4	Addresses time per week of physical education for high school students.	N/A	My district does not have a high school	
		0	Not mentioned	
		1	Any of the following: Suggests but does not require 225 minutes/week. Specifies total amount of physical education, but it is less than 225 minutes/week. Suggests that schools follow NASPE standards. Specifies number of classes per week without duration. Time is specified for overall physical activity that specifically includes physical education. Example: "Every effort will be made to make physical education available to students daily."	
		2	Either of the following: Requires 225 minutes/week or more of physical education. Requires schools to follow NASPE standards. Example: "District schools will follow NASPE standards when scheduling physical education classes for all students."	
PEPA5	Addresses teacher-student ratio for physical education.	0	Not mentioned	
		1	Vague and/or suggested Examples: "For physical education classes, the district shall staff those classes to provide for student safety and maximize student participation." "Physical education classes will have	

			<p>student/teacher ratios similar to those used in other classes."</p> <p>"Physical education class size is consistent with the requirement of good instruction and standing."</p>
		2	<p>Specific and required</p> <p>Example: "Physical education classes will have the same student/teacher ratios used in other classes."</p>
PEPA6	Addresses adequate equipment and facilities for physical education.	0	<p>Any of the following:</p> <p>Not mentioned.</p> <p>Generic statements about safe environment/facilities that do not mention physical education or indicative of equipment used for physical education. Suggests that schools follow "national physical education standards or nationally recognized guidelines for physical education and physical activity" without mentioning NASPE standards.</p> <p>Example: "Creating a positive environment for PA – all schools in the district will provide a physical and social environment that encourages safe and enjoyable activity for all students."</p>
		1	<p>Any of the following:</p> <p>Suggested or encouraged.</p> <p>Mentions NASPE standards OR the standards of American Alliance for Health, Physical Education, Recreation and Dance. (This Alliance embeds NASPE.)</p> <p>Requires schools to follow "national physical education standards or nationally recognized guidelines for physical education and physical activity" without mentioning NASPE standards.</p> <p>Indicates that play areas, facilities, and equipment used for physical activity shall meet accepted standards.</p> <p>Examples: "Pursuant to district XYZ, physical education is required to be offered to all pupils; therefore, schools are required to provide adequate facilities and instructional resources for the institution."</p>
		2	<p>Ensures that equipment and facilities specifically used for physical education are</p>
PEPA6	Addresses adequate equipment and facilities for physical education.		

		adequate NASPE standards do not qualify for a rating of a "2." Example: "The physical education program shall be provided adequate space and equipment and conform to all applicable safety standards."						
PEPA7	Addresses qualifications for physical education instructors.	<table><tr><td>0</td><td>Not mentioned</td></tr><tr><td>1</td><td>Either of the following: Credentials are vaguely referred to or suggested. NASPE standards are suggested. Examples: "Physical education shall be taught by appropriate staff." "When possible, physical education will be taught by a licensed instructor."</td></tr><tr><td>2</td><td>Either of the following: Requires that physical education be taught by a licensed instructor. Requires schools to follow NASPE standards. Example: "Physical education will be taught by a licensed instructor."</td></tr></table>	0	Not mentioned	1	Either of the following: Credentials are vaguely referred to or suggested. NASPE standards are suggested. Examples: "Physical education shall be taught by appropriate staff." "When possible, physical education will be taught by a licensed instructor."	2	Either of the following: Requires that physical education be taught by a licensed instructor. Requires schools to follow NASPE standards. Example: "Physical education will be taught by a licensed instructor."
0	Not mentioned							
1	Either of the following: Credentials are vaguely referred to or suggested. NASPE standards are suggested. Examples: "Physical education shall be taught by appropriate staff." "When possible, physical education will be taught by a licensed instructor."							
2	Either of the following: Requires that physical education be taught by a licensed instructor. Requires schools to follow NASPE standards. Example: "Physical education will be taught by a licensed instructor."							
PEPA8	District provides physical education training for physical education teachers.	<table><tr><td>0</td><td>Either of the following: Not mentioned. Staff only receives training/professional development related to physical activity without mention of physical education.</td></tr></table>	0	Either of the following: Not mentioned. Staff only receives training/professional development related to physical activity without mention of physical education.				
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PEPA8	District provides physical education training for physical education teachers	<table><tr><td>1</td><td>Suggested that all staff or physical education staff receive physical education-related training/professional development Example: "All staff involved in physical education should be provided with opportunities for professional development."</td></tr><tr><td>2</td><td>Provision of physical education training is required for physical education teachers If physical education-specific training is provided for a broader set of staff or teachers, it is assumed that physical education teachers are included and will receive the training too. Example: "Ensures PE staff will receive professional</td></tr></table>	1	Suggested that all staff or physical education staff receive physical education-related training/professional development Example: "All staff involved in physical education should be provided with opportunities for professional development."	2	Provision of physical education training is required for physical education teachers If physical education-specific training is provided for a broader set of staff or teachers, it is assumed that physical education teachers are included and will receive the training too. Example: "Ensures PE staff will receive professional		
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			development on a yearly basis." "...shall provide staff with adequate training in PE."
PEPA9	Addresses physical education waiver requirements (e.g., substituting physical education requirement with other activities).	0	<p>Either of the following: Not mentioned. Waivers for physical education are explicitly allowed in all instances. Example: "Unless otherwise exempted, all students will be required to engage in the physical education program." An exemption could include physical education waivers.</p>
		1	<p>Either of the following: Waivers for physical education are discouraged. Waivers for physical education are prohibited with the exception of substituting physical activities (e.g., team sports) for physical education. Example: "Academic activities shall not take the place of physical education. However, students on the school's sports teams may substitute participation for physical education credits.</p>
		2	<p>Prohibits substituting physical education with other activities, including physical activities. Rate this item as a "2" if waivers are prohibited with the exception of Individual(ized) Academic Plans (IAP) or Individual(ized) Education Plans (IEP). Rate this item as a "2" for the elementary level if the policy prohibits recess from taking the place of physical education. Example: "Schools shall not give physical education credit to student involved in sports. Sports and academic activities may not take the place of physical education."</p>
PEPA10	Regular physical activity breaks are provided for elementary school students during classroom time, not including PE and recess.	0	<p>Either of the following: Not mentioned. Only addresses physical activity before or after school.</p>
		1	<p>Vague and/or suggested Example: "Classrooms shall incorporate, where possible, appropriate, short breaks</p>

			that include physical movement."
		2	Either of the following: Regular physical activity throughout the day is required. Policy requires training for teachers on activities that incorporate physical activity throughout the day. Examples: "Physical activity opportunities shall be offered daily during the school day." "Shall provide Take 10! training to all teachers."
PEPA11	Addresses structured physical activity before or after school through clubs, classes, intramurals or interscholastic activities.	0	Not mentioned
		1	Either of the following: Provision is suggested. A list of physical activities that should be offered includes intramurals. Example: "Intramural offerings should be maintained at present levels and steadily increased to accommodate elementary, middle, and high school grades."
		2	Provision of physical activity classes, clubs, intramurals or interscholastic activities is required. Example: "Participation in intramural sports shall be an option for all students."
PEPA12	Addresses community use of school facilities for physical activity outside of the school day.	0	Not mentioned
		1	Availability of school facilities for physical activity is suggested Example: "The district should allow community-based organizations to use facilities outside school hours."
		2	Either of the following: States effort to promote the use of facilities. Ensures that facilities will be available. Example: "The district is encouraged to promote the use of school facilities outside of school hours for physical activity programs offered by community-based organizations."
PEPA13	Addresses not restricting physical activity as punishment.	0	Not mentioned
		1	Discouraged

PEPA13	Addresses not restricting physical activity as punishment.		Example: "Students should not be pulled out of physical education for any other content area instruction or punishment."
		2	Prohibition with exceptions for Individual(ized) Academic Plans (IAP) or Individual(ized) Education Plans (IEP) Example: "Staff members shall not deny participation in recess or other physical activity opportunities as a form of discipline or punishment unless the safety of students is in question."

PEPA14	Addresses provision of daily recess in elementary school.	0	Not mentioned
		1	Either of the following: Recess is included in a list of possible activities offered daily. It is suggested that recess will be provided daily. Example: "Supervised recess time should be provided to all students within each school day at all elementary schools."
		2	Specific and required Example: "All elementary school students shall have daily recess."

Section 5. Evaluation

#	Item	Rating Guidance	
E1	Establishes a plan for policy implementation.	0	Not mentioned
		1	Either of the following: Identifies having or developing a plan without strong language. Suggests that effort will be made to implement only parts of the policy. Example: "The district will strive to implement the policy by..."
		2	Uses strong language and identifies having or developing a plan for implementing specific policy changes. Example: "The principal shall ensure that vending machines are in compliance with district standards by the end of the first quarter of the school year."
E2	Addresses a plan for policy evaluation.	0	Not mentioned
		1	Either of the following: Some kind of pre-policy and post-policy assessment is implied.

			Example: "The district expects to conduct an assessment of the health and fitness policy in the spring."
		2	ALL of the following: An evaluation plan is required. Specific outcomes to be measured are stated (e.g., student fitness test, number of classes/workshops held, meal participation rates, fiscal impact, student learning, School Health Index). Example: "The Advisory Council shall meet at least annually to review nutrition and physical activity policies, evidence on student health impact, and effective programs and program elements."
E3	Addresses providing a progress report to a specific audience.	0	Not mentioned
		1	It is suggested that there will be a progress report Example: "The wellness committee will discuss ways to present their progress to the Superintendent."
		2	ALL of the following: Reporting on progress is required. It is clear that a report will be made to a specific audience (e.g., Board of Education, administration, Parent Teacher Association/Parent Teacher Organization, and the public). Example: "The advisory council shall prepare a report annually for the Superintendent evaluating the implementation of the policy and regulations and include any recommended changes or revisions."
E4	Identifies a plan for revising the policy.	0	Not mentioned
		1	Either of the following: Future intention in making a decision to revise. Examples: "May meet to discuss revisions to policy." "May suggest changes."
		2	Discusses revision to policy in any way by any person or group Examples: "Will meet to discuss revisions to policy." "The policy shall be revised as necessary."

School Wellness Policy Score Sheet

District ID _____

The following tables include wellness policy statement numbers and item descriptions broken down by section. Please rate the level to which each policy item is addressed in the school wellness policy.

0 = Not mentioned

1 = Weak Statement

2,3,4 = Meets/Exceeds Expectations

Section 1. Nutrition Education and Wellness Promotion		
Rating	#	Item
	NEWP1	Provides nutrition curriculum for each grade level.
	NEWP2	Links nutrition education with the school food environment.
	NEWP3	Nutrition education teaches skills that are behavior focused.
	NEWP4	Encourages staff to be role models for healthy behaviors.
	NEWP5	Specifies district using the Centers for Disease Control and Prevention's (CDC) Coordinated School health program model or other coordinated/comprehensive method.
	NEWP6	Specifies how district will engage families to provide information and/or solicit input to meet district wellness goals (e.g., through website, e-mail, parent conferences, or events).
	NEWP7	Specifies marketing to promote healthy choices.
	NEWP8	Specifies restricting marketing of unhealthful choices.
	NEWP9	Establishes an advisory committee to address health and wellness that is ongoing beyond policy development.
Section 2. Standard for USDA Child Nutrition Programs and School Meals		
Rating	#	Item
	US1	Addresses access to and/or promotion of the School Breakfast Program (USDA)
	US2	Addresses nutrition standards for school meals beyond USDA (National School Lunch Program / School Breakfast Program) minimum standards. Note: USDA "school meals" include beverages served with the meal.
	US3	Specifies strategies to increase participation in school meal programs. ("School meal programs" can be assumed to refer to breakfast and/or lunch.)
	US4	Ensures adequate time to eat.
	US5	Ensures nutrition training for food service director and/or onsite manager (or other person responsible for menu planning).
	US6	Addresses school meal environment.
	US7	Nutrition information for school meals (e.g. calories, saturated fat, sugar) is available.
Section 3. Nutrition Standards for Competitive and Other Foods and Beverages		
Rating	#	Item
	NS1	Regulates vending machines.
	NS2	Regulates school stores. Note: If policy only mentions concessions or snack bars, do not code for school stores, unless policy defines concessions and/or snack bars as including school stores.
	NS3	Regulates food service a la carte OR food sold as an alternative to the reimbursable school meal program (if not defined as to what this means).
	NS4	Regulates food served at class parties and other school celebrations.
	NS5	Addresses limiting sugar content of foods sold/served outside of USDA meals.
	NS6	Addresses limiting fat content of foods sold/served outside of USDA meals.
	NS7	Addresses limiting sodium content of foods sold/served outside of USDA meals.
	NS8	Addresses limiting calorie content per serving size of foods sold/served outside of USDA meals.
	NS9	Addresses increasing "whole foods" (whole grains, unprocessed foods, or fresh

		produce) sold/served outside of USDA meals.
	NS10	Addresses food not being used as a reward.
	NS11	Addresses limiting sugar content of beverages sold/served outside of USDA meals. (If the policy specifies guidelines for limiting added sugar in food, do not assume these guidelines apply to beverages).
	NS12	Addresses limiting regular (sugar-sweetened) soda sold/served outside of USDA meals. (If the policy specifies guidelines for limiting added sugar in food, do not assume these guidelines apply to beverages).
	NS13	Addresses limiting fat content of milk sold/served outside of school meals. (If the policy addresses limiting the fat content of foods, do not assume these policies apply to milk).
	NS14	Addresses serving size limits for beverages sold/served outside of school meals.
	NS15	Addresses access to free drinking water.
	NS16	Regulates food sold for fundraising at all times (not only during the school day).
Section 4. Physical Education and Physical Activity		
Rating	#	Item
	PEPA1	Addresses written physical education curriculum/program for each grade level.
	PEPA2	Addresses time per week of physical education for elementary school students
	PEPA3	Addresses time per week of physical education for middle school students.
	PEPA4	Addresses time per week of physical education for high school students.
	PEPA5	Addresses teacher-student ratio for physical education
	PEPA6	Addresses adequate equipment and facilities for physical education.
	PEPA7	Addresses qualifications for physical education instructors.
	PEPA8	District provides physical education training for physical education teachers.
	PEPA9	Addresses physical education waiver requirements (e.g., substituting physical education requirement with other activities).
	PEPA10	Regular physical activity breaks are provided for elementary school students during classroom time, not including PE and recess.
	PEPA11	Addresses structured physical activity before or after school through clubs, classes, intramurals or interscholastic activities.
	PEPA12	Addresses community use of school facilities for physical activity outside of the school day.
	PEPA13	Addresses not restricting physical activity as punishment.
	PEPA14	Addresses provision of daily recess in elementary school.
Section 5. Evaluation		
Rating	#	Item
	E1	Establishes a plan for policy implementation.
	E2	Addresses a plan for policy evaluation.
	E3	Addresses providing a progress report to a specific audience.
	E4	Identifies a plan for revising the policy.

Review scoring information on page 4.

Section 1: Comprehensiveness= (total # of items in Section 1 receiving a "1" or "2" /9) x
100= _____

Strength= (total number of items in Section 1 receiving a "2" /9) x
100= _____

Section 2: Comprehensiveness= (total # of items in Section 2 receiving a "1" or "2" /7) x
100= _____

Strength= (total number of items in Section 2 receiving a "2" /7) x
100= _____

Section 3: Comprehensiveness= (total # of items in Section 3 receiving a "1", "2", "3", or "4" /16) x
100= _____

Strength= (total number of items in the Section 3 receiving a "2" "3", or "4" /16) x
100= _____

Section 4: Comprehensiveness= (total # of items in Section 4 receiving a "1" or "2" /14) x
100= _____

Strength= (total number of items in Section 4 receiving a "2" /14) x
100= _____

Section 5: Comprehensiveness= (total # of items in Section 5 receiving a "1" or "2" /4) x
100= _____

Strength= (total number of items in Section 5 receiving a "2" /4) x
100= _____

Total Comprehensiveness= (total number of items in ALL sections receiving a "1", "2", "3", or "4"
/50) x 100= _____

Total Strength= (total number of items in ALL sections receiving a "2" "3", or "4"

APPENDIX B

School Wellness Policy Focus Group Questions and Agenda

Purpose of Discussion Groups:

1. Identify areas where support is most needed by schools to update and implement school wellness policies
2. Determine what concerns school personnel may have regarding school wellness policies so those issues can be addressed as part of planning efforts.
3. Ascertain perceived benefits of school wellness policies so those issues can inform promotion of efforts to support schools in management of policies.
4. Review school wellness policies and identify schools' priorities and areas where not willing to work.

Meetings Targeted:

In view of the busy schedules of those affiliated with schools, every effort will be made to have discussions with at least three of the following groups as part of regularly scheduled meetings.

- School Administrators
- School Nutrition Service Directors
- School Nurses
- Physical Education Teachers
- Curriculum Leads

Meeting Discussion Items:

- Introduction and Overview- 5 minutes (Moderator)
 - Introduction and purpose of assessment, benefits of school wellness policies and new requirements expected (Healthy, Hunger Free Kids Act)
 - Community capacity available to support schools- want to target where most needed
- Questions (15-20 minutes)
 - How many of you have had experience with school wellness policies?
 - What have been the biggest benefits experienced in your schools that have implemented these provisions?
 - What have been your biggest challenges or concerns in establishing and implementing these policies?
 - What supports would be most helpful to your schools in implementing and improving these policies and other issues related to healthy school environments?
 - Which policies are priorities for you? (If time doesn't allow, this information will be gathered from the paper survey distributed at the meeting)
- Please take a few minutes to complete the one-page survey we have distributed and return to us before you leave today.
- If you would like to be kept informed about the project, get involved with planning, or learn of the results, please leave your business card and we will add you to our mailing list.

APPENDIX C

School Wellness Policy Survey

Practices and Policies	<i>Practice/policy in your school?</i>		How beneficial is this policy/practice for healthy school environment?		
Questions 1-4	Yes	No	Beneficial	Maybe Beneficial	Not beneficial
1. Students are allowed to ...					
a. Have food or beverages in the classroom.					
b. Have water in the classroom.					
c. Bring food (or have parents bring food) into the cafeteria from local fast food restaurants					
d. Leave school grounds during lunch					
e. Use indoor physical facilities for recreation outside school hours.					
f. Use outdoor physical facilities for recreation outside school hours.					
g. Use school equipment for recreation outside school hours.					
2. Teachers and other school staff ...					
a. Use foods as rewards or incentives for students					
b. Use physical activity as form of punishment					
c. Withhold recess or physical education class as form of punishment					
3. Chocolate, candy and high-fat baked goods are used in ...					
a. Classroom fundraising					
b. School-wide fundraising					
c. Fundraising by school sports teams and/or clubs					
4. Does your school have any policies that ...					
a. Address length of time/time of day for recesses					
b. Address time students participate in physical education					
c. Address moderate to vigorous activity at least half of the total time during PE class					
d. Promote active commuting (e.g. Safe Routes to School, Walk to School Day)					
e. Regulate nutrition standards of food and beverages sold in school vending machines					
f. Regulate nutrition standards of food and beverages sold in schools or at schools or at school event					

Surveyor's Opinion Questions:

1. What challenges does your school (s) face to implement school wellness policies and practices?
2. What supports would be most helpful for your school (s) to implement school wellness policies and practices?